

**IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE AT NASHVILLE**

Chris Sevier Plaintiff V. Apple Inc, Hewlett-Packard, Eric Holder, United States Attorney General, Mike O'Reilly in his capacity at the Federal Communications Commission (FCC), Edith Ramirez, Chairman Of The Federal Trade Commission (FTC)		CASE NO: 3:13-cv-00607 Honorable Judge Campbell
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SECOND AMENDED COMPLAINT

God said, ‘You shall not eat of the fruit of the tree that is in the midst of the garden, neither shall you touch it, lest you die.’” But the serpent said to the woman, “You will not surely die. For God knows that when you eat of it your eyes will be opened, and you will be like God, knowing good and evil.”

NOW COMES the Plaintiff, under rule 15 of the Federal Rules of civil procedure within the 21 day threshold after the Defendants filed a 12(b)(6) motion to plead sufficiently. The Plaintiff comes under 15 U.S.C. § 1051, 28 U.S.C. Sections 2201, 42 U.S.C. 1983 pursuant to the 5th and 14th Amendment to the United States Constitution. (For clarity purposes "Defendants" when used in this complaint refers to HP and Apple, when used in this complaint).

The first amendment complaint presented a chance for the Defendants to sua sponte fix their device and dangerous product on their own without subjecting them to unnecessary ridicule and commercial loss. (Matthew 5:9: Blessed are the peacemakers). That ship has sailed. Instead of responding to Apple and HP's reckless and frivolous 12(b)(6) motion, which highlights their liability further, I'll respectfully submit this second amended complaint, which will address the issues they raised regarding sufficiency. Given the fact that (1) porn is an uncomfortable topic that can cause arousal just talking about it because we are sexual and spiritual beings; given that (2) these matters make me absolutely furious because Apple and Hewlett-Packard are not just defending themselves, they are taking a position that puts law enforcement at greater risk, while increasing the demand side of sex trafficking and child pornography; and given that (3) the international public eye is on this action and has asked me to break down these legal concepts further, I am going to attempt to keep the matters a bit light-hearted through the illustration of pictures. As this Court has seen a taste of through certain filings, I have received death threats for bringing this action because there is no question that my demand poses a threat to pornography addiction, triggering the fear of withdraw from the Defendants addicts. For these reasons, I would ask that the Court and opposing counsel permit a degree in leeway in this complaint that Apple's lawyer have described as raising "novel claims." I'd like the general public to understand some of these otherwise difficult points of law that some pictures will better illustrate than the mere words of a pro se. I ask for leeway in that regard under the lenient pro se pleading standard that applies here in these conditions, as the Defendants demonstrated in their motion to dismiss. In short, the Defendants have asserted that my first amendment complaint was insufficiently plead. Therefore, to alleviate their sincere concern, I shall plead sufficient (most of

these matters should be left to discovery).

**SECTION ONE: CLEARING GENERAL AMBIGUITIES IN THE FIRST AMENDED
COMPLAINT**



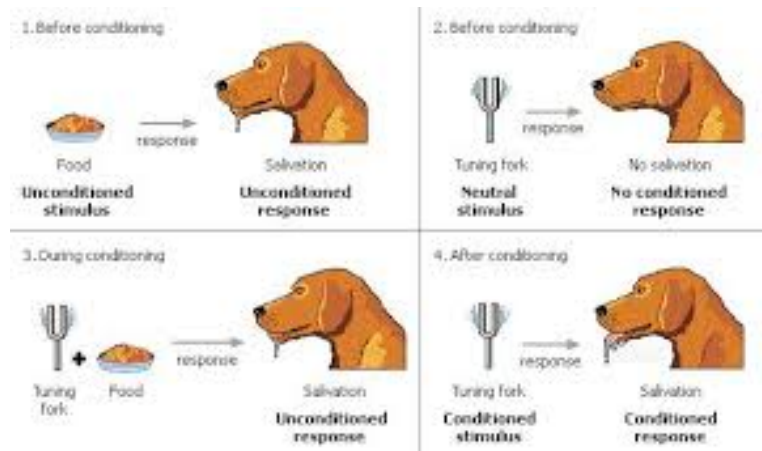
**1. THE DEFENDANTS PRODUCTS ARE DEFECTIVE DUE TO FRAUDULENT
SCHEME TO CAPITALIZE OFF OF AN AGENCY RELATIONSHIP WITH
PORNOGRAPHER PREDATORS WHO THEY HAVE COMMISSIONED TO DO**

THEIR BIDDING: In testing the first amended complaint for sufficiency, Apple and HP mischaracterize my position by stating that "*[I merely deem the Defendants] products to be defective because their computers are not sold pre-installed with pornography filters. In other words, plaintiff alleges that Apple's and HP's computers are defective because Apple and HP do not choose for their customers which third-party internet content they should or should not view.*" (See the motion to Dismiss). This mischaracterization is untrue, I deem their product to be defective because they designed it to invite pornographic predators, who they have an agency relationship with, to hunt down male purchasers, like myself, so that they can get us chemically dependent on one another's products because those products are interrelated. Apple and Hewlett-

Packard are in an actual agency relationship/business partnership with these predatory pornographers because they stand to be the primary financial beneficiaries of the pornographers efforts to inflict addiction-by-trick the Defendants' customers.

2. In aligning with pornographers, Apple and Hewlett-Packard profit the most, given the realities of arousal addiction, which will be discussed at trial (more and more different content is need to keep the addiction going, which eventually leads to the cutting out of the original pornographer who started the addiction process, but the device maker is never cut out of the equation). The Defendants welcome, invited, authorize, and encourage predatory pornographers to ensnare males into masturbating to porn on their products so that they will form an unnatural bond/dependency with the Apple and Hewlett-Packard products. Apple and Hewlett-Packard's true intent is to convert their costumers into walking billboards, through codependency that is reinforced by orgasm. The straight forward laws of nerochemical association are at play. The Defendants have established a silent, sick, perverted, immoral, business strategy that is grounded in both classic fraud and classic conditioning. (See Pavlov's dogs). The science of dopamine and the laws of sin are at play (the need for God and greed are at the core of this case). Apple, HP, the executive branch, and predatory pornographers know this to be the case. On the surface, Apple and Hewlett-Packard attempt to mislead the public that by holding themselves out to be against pornography. Nothing could be farther from the truth. Knowing that the porn they distribute is a serious problem, Apple and Hewlett-Packard have built marketing campaigns around selling porn free products for the soul purpose of putting their customers at ease to make them more susceptible to the tactics of their predatory pornographers, who they profiteer off of. When it comes down to actually selling porn free devices, the Defendants refuse to do so because, like

Backpages.com, they know that they are making a killing by working with pornographers to expose their customers to porn addiction. The Defendants are well aware that the more porn addicts they can create, the more money they make. Apple and Hewlett-Packard are drug dealers. They are at the helm of a criminal enterprise - sex trafficking and child pornography. Their devices not only pose a threat to myself. They are an internal threat to National security itself, as they threaten families, children, and marriages. President Obama, who just said that Marijuana is no more harmful than alcohol, clearly does not think porn is harmful either because he is not on the side of the truth. The President has ordered Eric Holder not to prosecute a single child obscenity case, which has put children in the cross hairs of predatory pornographers and emboldened the Defendants to target them. There is a collectivity of evil at work that will provoke God's wrath.





3 . THIS CASE IS NOT ABOUT CENSORSHIP AS THE DEFENDANTS ARGUE TO DEFEND THEIR PREDATORY PORNOGRAPHERS, THIS ACTION IS ABOUT PRODUCTS LIABILITY, FRAUD, CREATING ADDICTION, VIOLATING CHILD OBSCENITY LAWS, AND FIGHTING FOR THE VICTIMS OF SEX TRAFFICKING, CHILD VICTIMIZATION, PREVENTING INCARCERATIONS AND PROTECTING TRADITION MARRIAGE

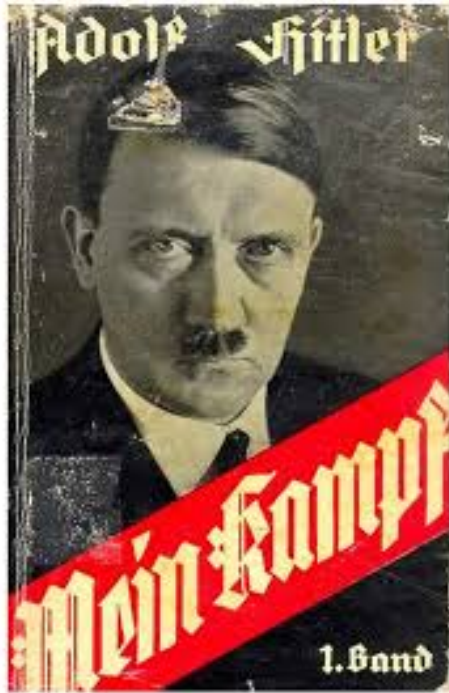


As a way to discredit me and stifle my speech, the Defendants have falsely accused me of "wrongful censorship." I know all about having your speech stifled. (See the A&E lawsuit that is set to be consolidated with this action - Obama "chilling effect doctrine."). In defense of their bad faith quest, Apple and Hewlett-Packard try to mislabel me as an enemy of "free speech" by accusing me of being a advocate of unreasonable censorship. This is not the first time my opponents in litigation have attempted to define me as something that I am not in an effort to justify a self-destructive agenda. (See the John Rich cases and the BRP's reprisal through the Tennessee Supreme Court: "stalker" is my favorite mischaracterization).

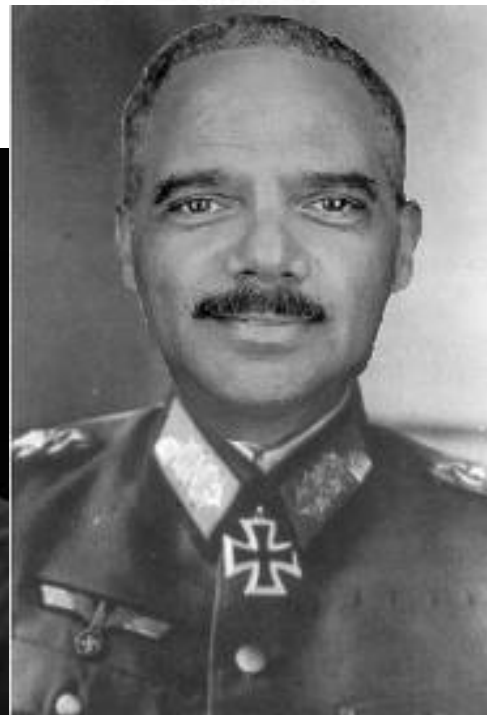
4. Because I believe in my oath as a Military Officer to protect and defend the United States Constitution and because I am a Christ follower, I have a propensity to "catch tigers by their toes in my pursuit to guard against the oppressed." These predators love to counter through mislabels and misdirections, in keeping with their corrupt nature, as they attempt to enable the continuation of some evil practice that hurts others for their benefit. Their false labels only exposes their true nature as the scoundrels that they are. My opponents all have one thing in common: they believe

that they are God and that the are above the law. Those who are on the side of the truth see these things to be self-evident.

5. Clearly, I am a major proponent of free speech. (See the A&E lawsuit which this case is set to be consolidated with). I am opposed to any form of dangerous sex speech that encourages and influences innocent people to engage in a course of sex that causes them to live a life style that is inferior, disparaging, and destructive. That is because I care about people because God cares about people. Apple and Hewlett-Packard, on the surface, try to market themselves as being against "porn speech," but then they deliberately leave the door wide open for their pornographic predators to hunt down their customers, hoping that their unsuspecting customers will fall prey to their schemes their defect device has exposed them to so that they become addicted to their online porn and dependent on their products. (Apple and Hewlett-Packard are the primary beneficiaries of their concerted efforts with pornographers). As any crack dealer knows, "addiction is great for all of the business involved," and this is the true business sloan of Apple and Hewlett-Packard, who mask themselves as family friendly entities, only deepening the fact that they are enemies of society by running what amounts to a prostitution racked. Prostitution is the logical conclusion of porn. This situation involves one of the greatest fraudulent scams in modern history, and Apple and Hewlett-Packard believe that the public is not catching on to their scam. The executive branch thinks that the public cannot see through their non responsiveness. (NOTE: It was Adolph Hitler who stated in Mein Kampf "What luck for rulers that men do not think.")



Adolf HITLER / Steve JOBS





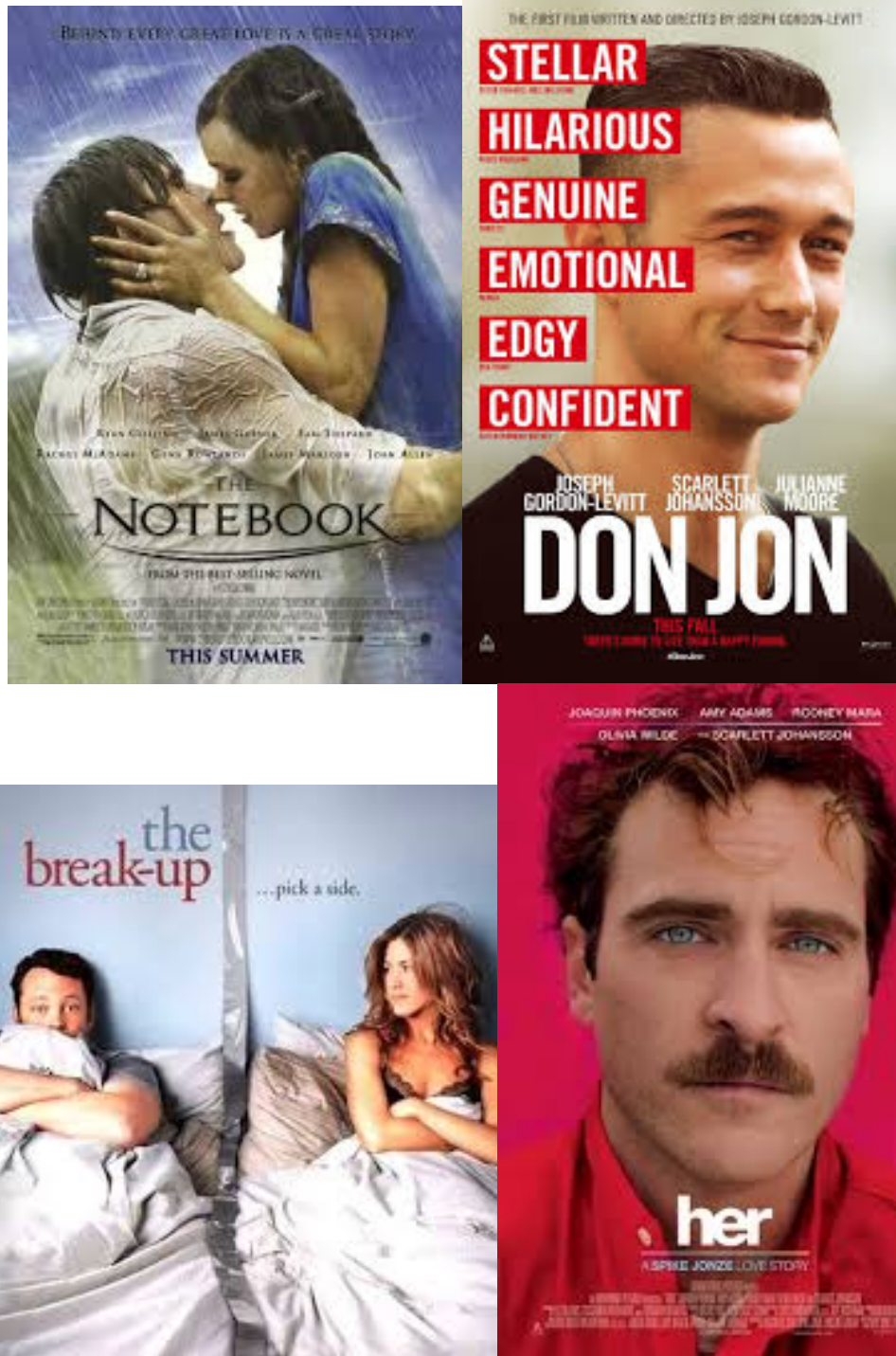
6. I am not asking Apple and Hewlett-Packard to be censors of the internet, as someone as only vile as Professor Ford would float. I am asking that Apple and Hewlett-Packard not work in concert with sexual predators by opening the door to allow them to victimize our families, children, and innocence for the ultimately financial benefit of the Defendants and their employees. I do not want to be injected with addicting substances by force any more than a girl in Thailand, who is chained to a bed wants to be injected with addicting drugs. The Defendants engaged in colossal fraud by marketing themselves as "pro-family" entities only to then welcome and entice sexual predators, who they have formed an alliance with, to cause customers like myself, to become addicted and chemically bonded to their products because they know that we are not tech savvy enough to protect ourselves against their scams. Like cigarette companies, Apple and Hewlett-Packard want their customers chemically and physically dependent on their products. Apple and Hewlett-Packard deserved to be completely bankrupted for this tremendous

violation of the law that they have violated for years without any responsiveness from the Department of Justice. [As the British Prime Minister pointed out, it is as if law makers did not think that anything could be done, but now they see that something can be done and has to be done about this problem.]

7. Apple and Hewlett-Packard know that when one of their customers masturbates to their computer pornography, they are not just having sex with the content, they are also subconsciously having sex with their product. This association of endorphins and dopamine creates the chemical bond that Apple and Hewlett-Packard pray for. It creates a chemical dependency through association, which is the same bond that is formed between men and blow up dolls. (See the Documentary Guys and Dolls). Humans have the ability to bond with inanimate objects, pets, and members of the same sex. But none of those sexual relationships are natural and healthy. They all produce inferior life styles. (If the law makes same sex couples to be a class, people who have sex with with their laptops are also a class - the law cannot have it both ways). The President and Eric Hold know these things to be true, but they cannot do anything about the child obscenity offenses in this country because it will undermine their mission to inflict same sex marriage upon us. They must be impeached and stopped (they will divide our Nation into two camps, and I am not talking about Republican and Democrat). Having an orgasm to a product causes the person to become chemically addicted and dependent to the object. Apple's and Hewlett-Packard's products are the distribution vehicle that provides the fix to the drug they place at their customers finger tips. At the end of the day, Apple's and Hewlett-Packard's products are a form of blow up doll. Apple and Hewlett-Packard are drug kingpins. Our daughters, families, and children are in danger by their defects. The way we think is in

jeopardy of being warped in an unhealthy way. I am asking that the Defendants nudge us in the right direction by setting up a system of accountability that protects our eyes and brains from encountering their pornography.

8. Their knowledge of these things is part of their grand marketing plan. Their knowledge of addiction is the paramount explanation why they refuse to do something as simple as sell their products on "safe mode" and actually honoring child obscenity laws like all of the other comparable businesses that provide access to smut. It is as if they want to hurt the world, not better it by allowing people to lie to themselves, and waste their lives mired in unhealthy delusions. Instead of protecting their clients from the dangers of their products, Apple and Hewlett-Packard are all about dirty hands and chemical addiction to their products. Nearly everything that Apple and Hewlett-Packard does is motivated by greed and built on a lie. That is why they have been hauled into Federal Court in our Jurisdiction. Apple and Hewlett-Packard want their customers as dependent on pornography and their devices to be the delivery mechanism to supply the fix. It is that simple. They are kingpins of a criminal enterprise. Parents, teachers, Judges, politicians, all have a duty to put an end to this reign of terror by these handful of narcissistic technologists. They have managed to prove that technology will not save your soul, but it can destroy it.



9. **NOT ALL FORMS OF SPEECH ARE PROTECTED**: Not all forms of speech are protect.

Libel and slander are not protected forms of speech. (See the John Rich lawsuits). Pornography

is not a protected form of speech by and large. Distribution of pornography is entirely illegal. Fraud is also not a protected form of speech, which is the only language that these Defendants' seem to speak at this point.

10. **GREED IS THE MOTIVE:** Apple and Hewlett-Packard have countered that my lawsuit is novel. It is not. The vices of greed and pride are not novel. They have been with us since the inception of mankind. My lawsuit is in response to those vices that the Defendants executives prioritize over safety of our children. The efforts of Hewlett-Packard and Apple to maximize profits, while being masked behind the veneer of "family friendliness", serves to poison our world from the inside out. Their devices and partnerships with predatory pornographers constitute a systemic cancer that is making mankind suffer. Their flagrant disregard of the law and callous attitude warrants strict liability in the highest form, as they must be required to pay for the sex trafficking epidemic they have sparked by thinking that their ways are superior to God's.

11. The Defendants have placed children and traditional marriage under attack hardcore, increasing distorting our collective prospectives on sex. Pop culture reflects that online pornography is spilling out into the mainstream. This is not just a problem behind close doors. *(For there is nothing hidden that will not be disclosed, and nothing concealed that will not be known or brought out into the open. Luke 8:17)* The way men and women see one another, shapes society. Apple and Hewlett-Packard have perverted our perception of men and women through selling these defective devices and teaming up with predatory pornographers, is having an adverse impact on our society. It must stop now. Guys and girls are trying to compete with porn stars in non-committed relationships which impacts their ability to bond with their spouse

down the road, and children are acting out sexually based on what Apple and Hewlett-Packard have exposed them to. The reason why abstinence is best is not because unmarried people should be worried about STDS. It is because having sex causes us to bond with whatever we are having sex with. So multiple sexual partners makes it harder to have a lasting relationship down the road (just ask any stripper). These Defendants must be brought to the heel for being the most evil entities of our modern time. They promised progress but have produced destruction and pose a threat to women and children. Our leaders must decided which one will be our motto.



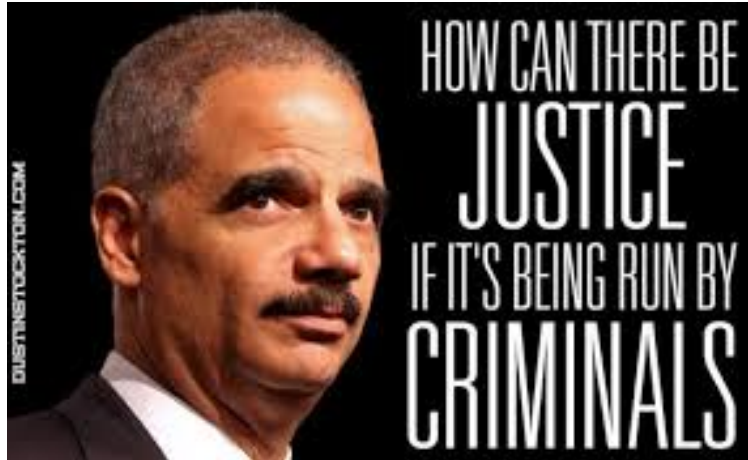


12. **LAST CHANCE:** No matter what happens in this case, the message about the problems that Apple and Hewlett-Packard is spreading beyond their control, thanks to movies like "Don Jon" and "Her." Even nonChristians can see that the Defendants products have placed us in danger, given the science of sex. The clock is ticking. It is inevitable, like in the Tobacco cases, that these Defendants will be exposed and taken down by the rallying cries of their victims and through organizations like "Fight The New Drug." Any politician worth his salt will make fighting this problem a priority, if they want the support of traditional families.

13. It is 2014, the Defendants' promises have been a let down. People are fatigued by technology, not improved. Technology cannot save us, only a relationship with Jesus can. The women in this Nation are quiet frankly tired of not being able to date a man who has not been adversely shaped under the malignant influence of the online pornography that Apple and Hewlett-Packard expose them to. If Professor Ford was actually ethical, herself, she would (1) refuse to defend these Defendants or (2) be jumping up and down with along side of me and the other expects to warn Apple and Hewlett-Packard that they are going to meet the fate of the Tobacco Companies, who also marketed to children in hopes of getting them silently addicted (while not caring who their products impacted their bodies and personal lives - this is the same

thing). The Defendants set out to created addicts by trickery, and it worked, they caused me to suffer, and here we are in Federal Court, and I will lay the ground work to enable class action lawsuits and RICO lawsuits to stamp out these incredible injustice that the Defendants have inflicted on our communities. The more the Defendants put up a fight, the more it will back fire and expose them as hypocritical liars that deserve total accountability. At this point, Apple's and Hewlett-Packard's only hope is to do the actual "family friendly thing:" set up a system of actual accountability and filters as I and the British Prime Minister propose.





**INSTITUTING A SYSTEM OF ACTUAL ACCOUNTABILITY THROUGH THE LIST
AND EYE CONTACT: WHICH IT IS AN ACT OF LOVE TO HOLD ONE ANOTHER
ACCOUNTABLE:**

15. What deters people from buying condoms at Walgreens and having premarital sex is the fact that purchaser has to look the clerk in the eye. (This is why you see condom machines in the bathrooms and not coke machines. Such matters are grounded in shame because they are not following God's natural plan. God's plans are designed to maximize utility). I not only demand that Apple and Hewlett-Packard sell their products with filters (which they clearly are in possession of the technology to do so, as they have indicated) I want them to be required to make their customers look one of their Geniuses in the eye when they request access to the porn. Given the specially destructive and highly addictive components of computer porn, I want these individuals names put on a list that is made available to spouses, churches, employers, and educators. I want these record available to the public no - different than criminal records - because computer porn is more dangerous than all other kinds of pornography (see the current status of the sex trafficking industry). I want a system of actual accountability, no more of this sham accountability nonsense.

16. Those who object to the list cannot have it both ways. They cannot complain about having their name added to the list and at the same time suggest that porn is harmless. Because if porn is harmless, they have nothing to worry about by having their name added to the list. (Just ask in of the sex offenders in prison if porn is harmless). Accountability is good for us personally and collectively. America is based on a system of checks and balances because our founding fathers knew that the human heart is inherently wicked. (that goes for every human, although the degree of wickedness varies). *The heart is deceitful above all things and beyond cure. Who can understand it? Jeremiah 17:9*





LIKE IN LANDLORD TENANT CASES, APPLE AND HEWLETT-PACKARD ARE IN THE BEST POSITION TO INSTALL AN ACCOUNTABILITY SYSTEM - NOT THE USER OR A DETACHED THIRD PARTY WITHOUT PRIVACY:

17. Like in the case of landlord tenant law, where the landlord is in the best position to have rental insurance, Apple and Hewlett-Packard are in the best place to sell their computers with filters and to operate a system of actual accountability (that bothers to comply with the law). If Apple and Hewlett-Packard complain that implementing this system to make them compliant with the law is expensive, they can factor that into the cost of their product, like like a landlord can factor in the cost of renters insurance in the lease. I am simply demanding that Apple and

Hewlett-Packard live-up to their false marketing image and sell family friend products. I am asking them to get out of the bed with their fellow pornographic predators and protect the families they are marketing to. Admittedly, this matter is not like the landlord/tenant scenario insofar as it is merely advisable that the landlord have insurance on the rental property, not obligatory. Here, Apple and Hewlett-Packard have a mandatory duty to comply with the laws of the United States and to abandon their agency relationship with predatory pornographers, which causes their clients to suffer from addiction. Apple and Hewlett-Packard have a duty to strictly comply with my demand because they are in direct violation of products liability tort, res ipsa Loquitur, invasion of privacy, outrageous conduct, and other torts. More importantly, Apple and Hewlett-Packard have a duty to comply with child obscenity laws, which prohibit them from distributing pornography to minors. Apple and Hewlett-Packard have a legal obligation not to run a business that is proliferating sex trafficking and child rape.





**THERE ARE NO PORN FILTERING COMPANIES IN EXISTENCE WHO ARE
SITUATED LIKE APPLE AND HEWLETT-PACKARD AND IT IS NOT THE JOB OF A
THIRD PARTY TO KEEP THE DEFENDANTS IN COMPLIANCE WITH THE LAW**

18. In the summer of 2013, when I was in Asheville North Carolina, I met with Sean Parker's right hand man at Napster, who suggested that, it would be best if Apple and HP issued updating filtering software that adapted to the changing of pornographic content, which would constantly make the filters stronger. This developing filter system could be written into the operating system that the Defendants are constantly sending to their devices. Apple and Hewlett-Packard are extremely unique in that they never really leave the control of the manufacturer, even after the products have left the retail store and are seemingly in the customers control. (This makes Apple and Hewlett-Packard especially susceptible to strict liability under products liability). Only Apple and Hewlett-Packard can provide such updates, not an inferior-detached-third-party-filtering company, who has no privity of contract. Apple and Hewlett-Packard are in a unique position unlike any third party filtering company. Apple and Hewlett-Packard can taylor make a porn-filtering software that fits their devices uniquely in light of the content they know they are distributing. No third party should be expected to read the minds of these defendants, any more than their customers should. It is the Defendants job to be in compliance with the law, not a third party's duty to include their customers.



19. I DO NOT RECOGNIZE ANY THIRD PARTY FILTERING COMPANIES BUT IF THEY DO EXIST THEIR PRESENCE IS AN INDICTMENT ON THE DEFENDANTS

LIABILITY: Additionally, I most certainly do not identify, recognize, or acknowledge the existence of third party porn-filtering-companies, who are not part of this lawsuit, as Apple and Hewlett-Packard have falsely alleged in amounting their backfiring defense. Even if such companies exist - which they do not - their products do not absolve Apple and Hewlett-Packard of civil and criminal liability. In fact, their existence underscore guilt. It is not the job of a third party company to be Apple's and Hewlett-Packard's clean up. A third party filtering company is evidence of Apple's and Hewlett-Packard's criminal liability. (If Apple and Hewlett-Packard partnered with these third party filtering companies, who they recognize, they might be able to avoid criminal prosecution). I think that the sound minds on the 6th Circuit and Supreme Court will have a field day with Apple and Hewlett-Packard's rotten reasoning laced throughout this action, in asserting as a defense that there are other companies, who their customers can track down to make their products less defective and dangerous. [That would be like Six Flags telling its patrons that they can ride the roller coasters but they need to track down a third party to install

a seat belt if they want to be safe - its ridiculous and evidence of greed.]. Nowhere in the history of this country has a Defendant taken such a backfiring position. Once again, Apple's and Hewlett-Packard's arguments are going to be used against them in exposing their corruption and fraud in bringing them to accountability in this Court and in the Court of public opinion (that bends towards justice).







20. **LYRICAL INJUNCTION ON THE SENIOR CITIZEN ATTORNEY'S EMPLOYED**

BY APPLE AND HEWLETT-PACKARD: As a professional EDM songwriter/singer, allow me to point out that Professor Ford's application of notion that "one man's vulgarity is another's lyric" is such perversion of the application of that statement in this action that it calls into question her competency to hold a law license. The Supreme Court made that statement one time in 1971, which was before either myself and the Defendants' "scapegoat internet" were even in existence. Cohen v. California, 403 U.S. 15, 25 (1971). I ask that the Court admonish counsel, and leave the the lyric writing to me, the excuse making to the Defendants.



VS



21. **PORN IS TO HARD TO DEFINE IS THE DEFENDANTS' CHEIF EXCUSE FOR VIOLATING OBSCENITY LAWS? WHAT? THE DEFENDANTS WOULD BE BETTER OFF SAYING WE DO NOT WANT TO COMPLY WITH THE LAW BECAUSE WE ARE GREEDY**

In keeping with a pattern of making strikingly pathetic-frivolous arguments in furtherance of malicious hypocrisy, Apple and Hewlett-Packard defend against this action and justifies all of the poison they are inflicting on this world by offering that they are not smart

enough to be able to define porn. This kind of lame excuse making is proof by itself that the Defendants are in league with porn predators who they invite, welcome, encourage, authorized, and ratify to prey on their unsuspecting customer through a deliberate design flaw that is exacerbated by a false advertising. Anyone with basic reasoning skills can draw this inescapable inference.

22. The Defendants know perfectly well that there are marriages, children, and daughters across the globe being, who are caught in their cross hairs and are victimized because Apple and Hewlett-Packard's perverted business strategy and insatiable greed, and yet, the Defendants have the never to play charades before this Honorable Court? It is this kind of lame excuse making that has allowed Apple and Hewlett-Packard to be at the helm of what amounts to a world-wide sexual holocaust, and the best they can come up with before this Court is that they deserve special treatment because "they do not know how to define porn." It is as if the Defendants are begging this Court and the youth of America, through groups like "Fight the New Drug," to tear these Defendants for thinking so little of the intelligence of the public. It is 2014 and their scams will not survive scrutiny. (see *Proverbs 14:5 A faithful witness will not lie: but a false witness will utter lies*).

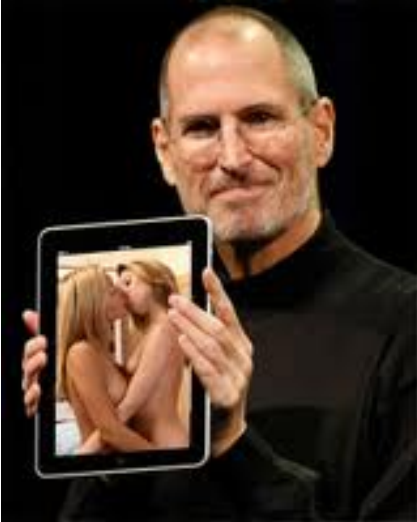
23. **STEVE JOBS KNOWS WHAT PORN IS BY HIS OWN OMISSIONS**: Clearly, Apple does know what porn is, and their position before the Court is merely an extension of their life-style of "fraud at all cost." Steve Jobs stated in August 2010 as part of a marketing effort to convince customers to buy Apple's products over Android's: "*we do believe we have a moral responsibility to keep porn off the iPhone.*" Clearly, Apple knew what porn was at one time. At best, Apple could argue that it does not know what an "app" is, since Safari constitutes the

greatest porn "app" of all time, and is found on all of their products, including the iPhone 5.

Although Apple made some sham attempts to keep some porn aps off of the iPhone 5, they left Safari on the iPhone without any mechanisms to block the porn on Safari. There is more hardcore graphic pornography available on Safari, then any single porn App in the world. This is the kind of fraud that should virtually allow me to bankrupt both of these vicious monsters for fraud. Requiring them to pay out billions of dollars to organizations fighting the sex trafficking epidemic they have cultivated. These Defendants have become so drunk on their lack of accountability that have convinced themselves that their brand name makes them immune to liability. Neither President Obama nor Eric Holder are in a position to do their job. They do not understand the job of the executive branch. The Courts must take a stand for the rule of law and the legislature must impeach the executive for failing to execute the laws of the United States. This is not a political matter. This is about protecting society and defending the rule of law. This action is centered on the restoration of honor. Our nation is divided between Christians and non-christians, not something as retro as Republican and Democrats. This gap is going to widen.



**IMPEACH
OBAMA
NOW!** *why
wait?*



24. **HEWLETT-PACKARD KNOWS WHAT PORN IS BECAUSE THEY FIRED THEIR**

CEO MARK HURD OVER A PORN RELATED EVENT: Moreover, Apple and Hewlett-

Packard clearly have the common sense capability know what porn is because they have porn policies that they subject their employs too. Hewlett-Packard fired CEO Mark Hurd in 2010 because a former porn star, Jodie Fisher, accused him of sexual harassment. It was later revealed that Mr. Hurd did not even violate the policy. Hewlett-Packard's over reaction was a marketing stunt to fool the public into believing that they had a zero tolerance policy towards sex offense to appear to distance themselves from their joint collaboration with predatory pornographers, who they profiteer on. However, despite this misdirection, they proceed to be the worldest largest distributor of pornographic material to minors - ramping up sexual harassment cases throughout

the globe. Let us not forget that more child pornography cases involved the use of Hewlett-Packard device than any other device maker. The firing of Mr. Hurd is evidence of guilt and fraud, and this Court should not allow it. Hewlett-Packard fired Marc Hurd for possible sexual harassment, remains at the helm of the proliferation of sex trafficking and child porn demand. It is wicked hypocrisy. It is not those who view child porn who should go to jail, unless we first prosecute those who distributed the child porn to them in the first place. I think "HP" stands for "hypocrisy." Maybe that should be their new marketing strategy after this case is concluded.





**. APPLE AND HEWLETT-PACKARD HAVE A DUTY TO KNOW THE LEGAL
DEFINITION OF PORNOGRAPHY PUT FORTH IN ALL 50 STATES TO INCLUDE
TENNESSEE:**



25. Fortunately, the state of Tennessee, whose child obscenity laws Apple and Hewlett Packard

are molesting, made defining pornography extremely clear. Although Apple and Hewlett-Packard have terrible attorneys, like Professor Ford, they have a duty to know this law. Acting as Apple and Hewlett-Packard's true advocate, I direct them to review TCA §§ 39-17-901-927. Yet, here are some basic relevant definitions set forth by the state of Tennessee for them to consider:

§ 39-17-901. Definitions

The following definitions apply in this part, unless the context requires otherwise:

- (1) “Actual or constructive knowledge” means that a person is deemed to have constructive knowledge of the contents of material who has knowledge of facts that would put a reasonable and prudent person on notice as to the suspect nature of the material;
- (2) “Community” means the judicial district, as defined in § 16-2-506, in which a violation is alleged to have occurred;
- (3) “Distribute” means to transfer possession of, whether with or without consideration;
- (4) “Excess violence” means the depiction of acts of violence in such a graphic or bloody manner as to exceed common limits of custom and candor, or in such a manner that it is apparent that the predominant appeal of the material is portrayal of violence for violence's sake;
- (5) “Final judgment” or “conviction” means all direct appeals have been exhausted including an application for appeal or for certiorari to the Tennessee or United States supreme court;
- (6) “Harmful to minors” means that quality of any description or representation, in whatever form, of nudity, sexual excitement, sexual conduct, excess violence or sadomasochistic abuse

when the matter or performance:

(A) Would be found by the average person applying contemporary community standards to appeal predominantly to the prurient, shameful or morbid interests of minors;

(B) Is patently offensive to prevailing standards in the adult community as a whole with respect to what is suitable for minors; and

(C) Taken as whole lacks serious literary, artistic, political or scientific values for minors;

(7) "Matter" means any book, magazine, newspaper or other printed or written material or any picture, drawing, photograph, motion picture film, videocassette or other pictorial representation, or any statue, figure, device, theatrical production or electrical reproduction, or any other article, equipment, machine or material that is obscene as defined by §§ 39-17-901--[39-17-917](#);

(8) "Minor" means any person who has not reached eighteen (18) years of age and is not emancipated;

(9) "Nudity" means the showing of the human male or female genitals, pubic area, or buttocks with less than a fully opaque covering or the showing of the female breast with less than a fully opaque covering of any portion below the top of the nipple, or the depiction of covered male genitals in a discernibly turgid state;

(10) "Obscene" means:

(A) The average person applying contemporary community standards would find that the work, taken as a whole, appeals to the prurient interest;

(B) The average person applying contemporary community standards would find that the work depicts or describes, in a patently offensive way, sexual conduct; and

(C) The work, taken as a whole, lacks serious literary, artistic, political, or scientific value;

(11) “Patently offensive” means that which goes substantially beyond customary limits of candor in describing or representing such matters;

(12) “Prurient interest” means a shameful or morbid interest in sex;

(13) “Sadomasochistic abuse” means flagellation or torture or physical restraint by or upon a person for the purpose of sexual gratification of either person;

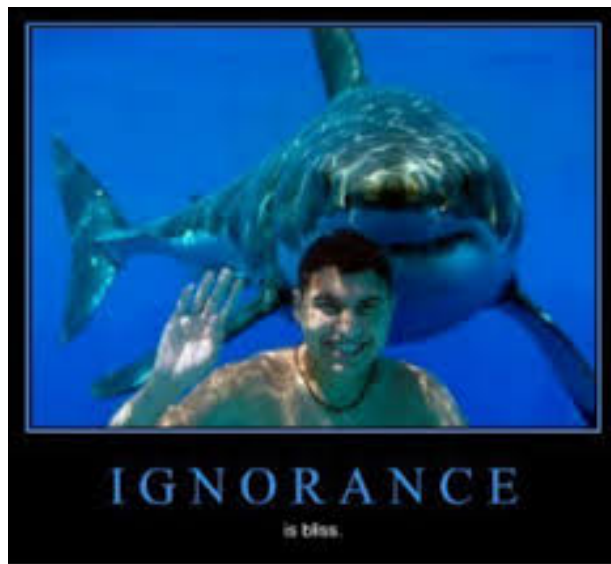
(14) “Sexual conduct” means:

(A) Patently offensive representations or descriptions of ultimate sexual acts, normal or perverted, actual or simulated. A sexual act is simulated when it depicts explicit sexual activity that gives the appearance of ultimate sexual acts, anal, oral or genital. “Ultimate sexual acts” means sexual intercourse, anal or otherwise, fellatio, cunnilingus or sodomy; or

(B) Patently offensive representations or descriptions of masturbation, excretory functions, and lewd exhibition of the genitals; and

(15) “Sexual excitement” means the condition of human male or female genitals when in a state of sexual stimulation or arousal.

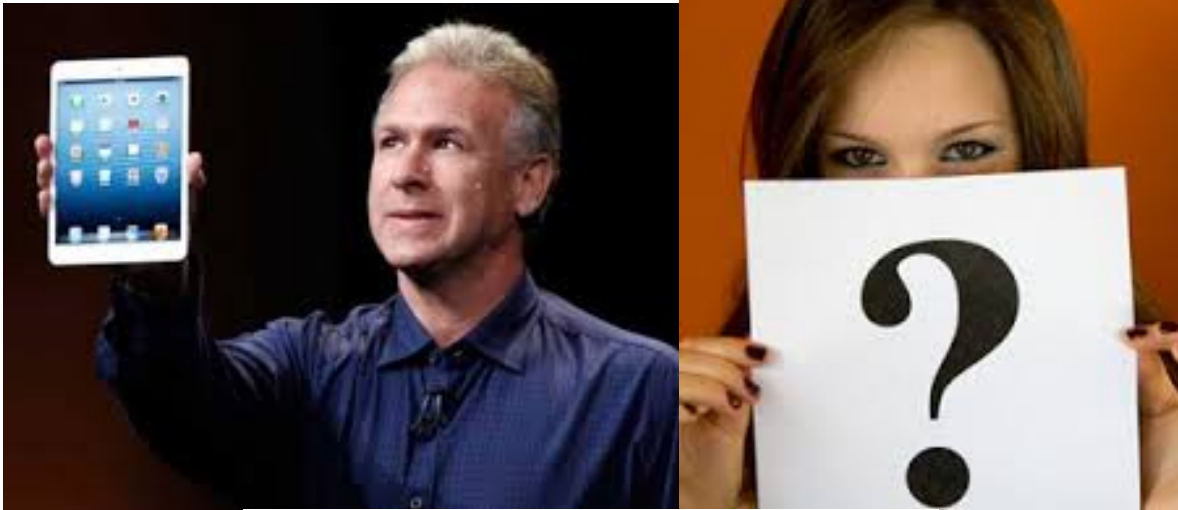
26. **IGNORANCE OF THE LAW IS NO EXCUSE**: The United States Supreme Court stated, "ignorance of the law is no excuse." Cheek v. United States, 2111 S. Ct. 604 (1991). Apple has a legal obligation to know the definition of pornography that it is distributing to its customers. It does not matter how special Apple and Hewlett-Packard think they are because they are selling "advanced technology" they are subject to the laws of the United States and state law, which they have completely ignored, creating cataclysmic destructive forms of sex.



27. **THE UNITED STATES DEFINITION OF OBSCENITY**: The United States Supreme Court has graced us with the definition of pornography, which rendered Apple and Hewlett-Packard without excuse.

"Although lower courts in the U.S. had used the Hicklin standard sporadically since 1868, it was not until 1879, when prominent federal judge Samuel Blatchford upheld the obscenity conviction of D. M. Bennett using the Hicklin test, that the constitutionality of the Comstock Law became firmly established. In Rosen v. United States (1896), the Supreme Court adopted the same obscenity standard as had been articulated in a famous British case, Regina v. Hicklin, [1868] L.

*R. 3 Q. B. 360. The Hicklin test defined material as obscene if it tended "to deprave or corrupt those whose minds are open to such immoral influences, and into whose hands a publication of this sort may fall." The Court ruled in Roth v. United States, 354 U.S. 476 (1957) that the Hicklin test was inappropriate. Instead, the Roth test for obscenity was whether to the average person, applying contemporary community standards, the dominant theme of the material, taken as a whole, appeals to the prurient interest. In 1964, in Jacobellis v. Ohio, Justice Potter Stewart in applying the Roth test pointed out that "community standards" applicable to an obscenity are national, not local standards. He found that the material in question is "utterly without redeeming social importance". Also, in attempting to classify what material constituted exactly "what is obscene," infamously wrote, "I shall not today attempt further to define the kinds of material I understand to be embraced...[b]ut I know it when I see it..." In Memoirs v. Massachusetts (1966) (dealing with the banning of the book *Fanny Hill*) the Court applied the Roth-Jacobellis test to determine that though the other aspects of the test were clear, the censor could not prove that *Fanny Hill* had no redeeming social value. In 1973, the Supreme Court in Miller v. California established the three-tiered Miller test to determine what was obscene (and thus not protected) versus what was merely erotic and thus protected by the First Amendment. Delivering the opinion of the court, Chief Justice Warren Burger wrote: The basic guidelines for the trier of fact must be: (a) whether 'the average person, applying contemporary community standards would find that the work, taken as a whole, appeals to the prurient interest, (b) whether the work depicts or describes, in a patently offensive way, sexual conduct specifically defined by the applicable state law; and (c) whether the work, taken as a whole, lacks serious literary, artistic, political, or scientific value."*



28. **APPLE AND HEWLETT-PACKARD MARKET TO CHILDREN SO THEY SHOULD KNOW THE DEFINITION OF CHILD PORNOGRAPHY WHICH APPLE AND HEWLETT-PACKARD CLAIM TO BE UNAWARE OF:** The way that Apple and Hewlett-Packard defectively sell their devices to children, while acting in league with child pornographers is outrageous. It commands prosecution by a functional version of the Department of Justice. Apple and Hewlett-Packard falsely advertise as pro-family companies; yet they are amping up the demand side of child pornography and child victimization in their reckless quest

to maximize profits and generate porn addiction. As retailers and manufacturers, Apple and Hewlett-Packard have the duty to know the legal definitions of child pornography, just like all of the other businesses that sell smut. 18 U.S.C. Chapter 110, child pornography is defined under United States law as the visual depiction of minor children under the age of 18 engaging in various sex acts. Hewlett-Packard, more so than Apple, is clearly profiting by not complying with 18 U.S.C. Chapter 110. (There are more child pornography convictions on PC than there are on Macs). Many court cases now use “Dost factors” (named after the U.S. v. Dost case in 1986) to determine whether an image is pornographic: these factors ask whether the focal point of the visual depiction is the child’s genital region; whether the setting of the image is sexually suggestive; whether the child is posed unnaturally or in inappropriate attire; whether the child is nude, semi-clothed or fully clothed; whether the picture indicates the child’s willingness to engage in sexual activity; and whether the image is intended to elicit a sexual response in its consumer or viewer. Notwithstanding the popularity of these factors, the U.S. Supreme Court has also stated that fully clothed images may constitute child pornography. In recent years, much attention has been given to the presence and availability of child pornography on the Internet. Laws such as the Child Online Protection Act (47 U. S. C. §231) and the Children's Internet Protection Act (47 U.S.C. § 254) outlaw child pornography and cover new media such as websites and other online forms of child porn. It is a direct result of the executive branches non-responsiveness to device makers criminal violations that the church has formed hundreds of organizations to clean up the colossal mess. Government non responsiveness/combined with the problems that the Apple's and Hewlett-Packard's devices have created has lead to the creation of hundreds of anti-sex trafficking organizations. Its not like I went out and started these

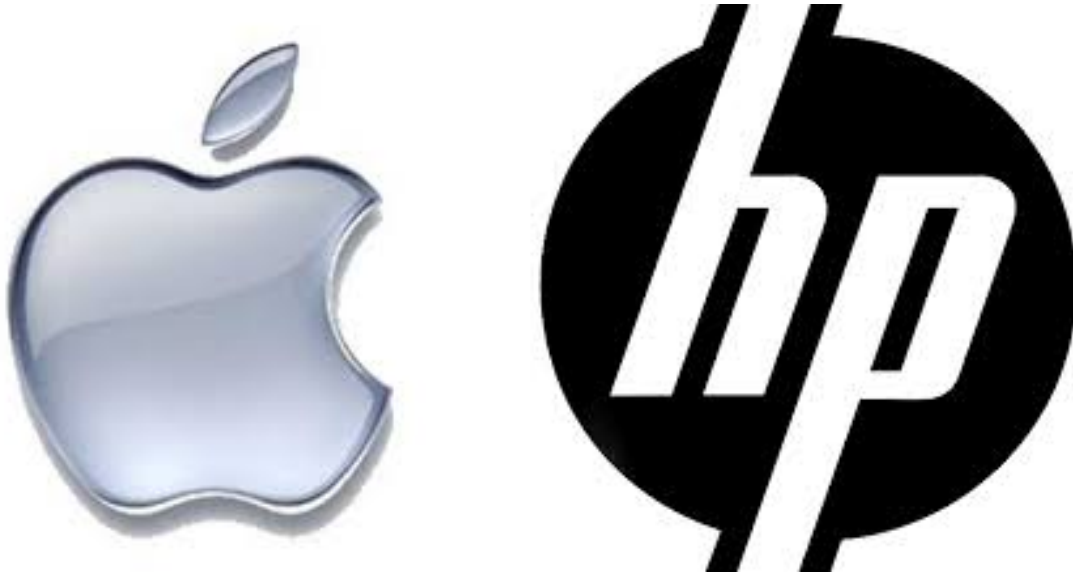
organizations because I am on some quest to shake down these rotten Defendants. The Defendants products are so defective, they have given a monumental boost to organized crime throughout the globe in the way of sex slavery. At the helm of this slavery is President Obama and Eric Holder, who are turning a blind eye to this problem to further the same sex marriage plight, which is not even remotely an equal protection matter.



29. **LAYMAN'S TERM DEFINITION PORN OF THE NON-LAWYERS:** For us layman, the definition of pornography (often abbreviated as "porn" or "porno" in informal usage) (Greek: πορνεία, porneia, fornication) is the explicit portrayal of sexual subject matter for the purpose of sexual arousal. Pornography may use a variety of media, including books, magazines, postcards, photos, sculpture, drawing, painting, animation, sound recording, film, video, and video games. Apple's and Hewlett-Packard's pornography is a special kind of pornography that is the most highly addictive and deserves to be in a class off by itself.

30. **IF A GAS STATION CLERK KONWS WHAT PORN IS SO SHOULD APPLE AND HP - WHO ARE UNDER THE SAME LEGAL DUTIES AS A 711 THAT SELLS HUSTLER:**





Fortunately, even though Apple and Hewlett-Packard, like so many of my past opponents, think that they are above the law, they are not (neither is Eric Holder he must be held to account by the inspector general, and if the inspector general will not take action, the inspector general must be replace, and on it goes, until the law as it is written is executed). The Defendants are required to know the legal definitions and to comply with the child obscenity laws in the same way that a gas station is. The gas station clerk cannot allow a minor to leave the store with a Hustler magazine. This is true even though Hustler Magazine has some legitimate nonsexual content bundled up inside (such as sports ads). Apple and Hewlett-Packard are required under the law to not allow minors to leave the store with what amounts to an "electronic box of the worlds greatest supply of smut with some other data mixed in." Apple and Hewlett-Packard are inescapably distributing pornography to minors, by not taking the affirmative steps to make it so that their collaborating pornography predators, cannot expose minors to pornography, as minors put to use the defect and illegal product as it was intended. The FCC and law enforcement must crack down as our brothers and sisters in the United Kingdom are. I want to see a joint task force formed immediately. There must be the enforcement of law on the Defendants even if doing so

causes their fraudulent-greed-scheme to convert the world into a codependency addiction with their products through the false camouflage of "family friendly propaganda" is inflicted a severe financial blow. *(NOTE: Galatians 6:3 For if anyone thinks he is something, when he is nothing, he deceives himself; Romans 13:1 Let every person be subject to the governing authorities. For there is no authority except from God, and those that exist have been instituted by God; Matthew 18:6. If anyone causes one of these little ones--those who believe in me--to stumble, it would be better for them to have a large millstone hung around their neck and to be drowned in the depths of the sea. Therefore, having put away falsehood, let each one of you speak the truth with his neighbor, for we are members one of another. Ephesians 4:25.)*





There is no such thing as personal accountability. That is why we have a system of checks and balances - three separate parts.

31. BEST EFFORTS ATTEMPT TO BLOCK IS WHAT THE BRITISH PRIME MINISTER AND I ARE REQUIRING THE UNITED STATES TO MAKE APPLE AND HEWLETT-PACKARD COMPLY WITH:

Furthermore, on the issue of defining porn, the British Prime Minister and I are not asking for the imposition of an unreasonable absolute blocking. [The only unreasonable presence in this action so far is Professor Ford, who is going to make Apple and Hewlett-Packard look worse the more she tried to defend them because the law is not on their side even remotely]. The British Prime Minister and I are simply requesting Apple and Hewlett-Packard merely make good faith/reasonable attempts to filter out pornography, actually living up to their false marketing campaigns as being "family friendly companies." To do this the British Prime Minister and I are asking that Apple and Hewlett-Packard end terminate their partnership with pornographic predators that they keep as a secret, who are making their customers codefendant on their products. We understand that such a request is like asking a drug dealer to make "blue magic" less potent. (See American Gangster). But the Defendants are poisoning our country from the inside out, and making sex worse for everybody, setting a terrible example for children, greatly increasing sex crimes in horrible ways, and launching an all out assault on traditional families. As the Defendants have been falsely advertising for years, their products should only be used for family friendly activities, unless the purchaser is over 18 and chooses to subject himself to the perils of pornography. The second demand that the British Prime Minister and I make is that the system include face-to-face accountability (no more of this phony accountability marketing stunts). Checks and balances is the American way. The customers who want the porn filters removed with have to have their named added to a list that is accessible to the public. A

list is valid because of the highly addictive danger of computer generated pornography. Our Nation needs an executive with real leadership capabilities. Not some child in office, who is championing legalizing drugs and policies that destroy children, and generate sex trafficking.





PARADOXICALLY GOD'S WILL IS NOT TO LEGISLATE MORALITY SO NEITHER AM I FOR THAT - THE GOOD NEWS IS THAT APPLE AND HEWLETT PACKARD DO NOT HAVE TO COMPLETELY ABANDON THE PARTNERSHIP WITH THEIR PORNOGRAPHIC PREDATORS - I CALL FOR PARTIAL ABANDONMENT

(One of the best solutions in this case so far to the problem the Defendants have created: <http://www.faithit.com/the-way-this-video-connects-porn-and-global-injustice-will-make-you-see-the-world-in-a-very-different-way-warning-you-cant-unwatch-this/>
#Us__vruez_yU.facebook)

32. I am a Christ Follower. But paradoxically God does not want government to legislate morality absolutely. (that is what Muslim countries try to do, which produces misery. We have separation of church and state in America because God wants us to choose him freely); therefore, I am not a proponent for legislating morality. Sin is a condition of the heart and it cannot be legislated away entirely by the force of law, but the law is designed to make reasonable attempts to deter sinful activity (activity that is bad for us - not to be a kill joy - but to make us happy). The only solution to sin is a relationship with Jesus Christ. (*Ezekiel 36:26 And I will give you a new heart, and a new spirit I will put within you. And I will remove the heart of stone from your flesh and give you a heart of flesh.*) Countries like Iran rely on a half-baked-plagiaristic version of Christianity. Islam came after Christianity and is a perversion of the faith of our founding fathers that we have been the beneficiaries of. Muhammad is a counterfeit, who controls through fear and works-based-righteousness. His followers believe that they can earn salvation through works-by-degrees, and this is why it is logically for Muhammad followers blow themselves up, and kill Americans, who they consider to be infidels. Such suicides are said to be an attempt to earn God's acceptance. Such an idea is a lie from hell in the same way that Apple and Hewlett-Packard's products are not defective in their current condition) But Muhammad, like Apple and Hewlett-Packard, is lying to his listeners, which is a religion grounded in pride (from a disgruntled culture) and salvation by degrees through ones own strength. So, I am not for using Government attempts to legislate away sin completely. It will never work - see prohibition. (The greatest threat to Iran is the underground Christian movement and that is why we in the United States cannot tolerate any persecutions of Christians - see the A&E case that is set to be

consolidated with this one. Obama and Eric Holder must be impeached because they are not capable of executing our laws, nearly all of which are derived from Christianity because they do not know Jesus. The only for socialists like Obama and Eric Holder to silent Christians from spreading the truth will be to persecute us. They cannot have it both ways because the truth will prevail).

33. The human heart is so wicked that when one form of sin is stamped out, it shifts to another. I saw that first hand while deployed in Iraq on Title 10 Jurisdiction, where all forms of sex were illegal - to include pornography. (See the case that was before Judge Trauger against Congressman Windle - a Democrat that the Inspector General's office under the Obama Administration refused to prosecute because Congressman Windle is a Democrat. The DoD allowed him to break the law in the same way that they are allowing Apple and Hewlett-Packard to break the law. The Department of Defense is selectively enforcing the law, no different than Nancy Jones at the BPR was; The Department of Defense believes that enforcement of the law is a political decision, when that is not the reason they are in office). Once sex and drinking were outlawed in a combat zone, gossip became a huge problem amongst our ranks. Sin has away of morphing itself. That's why simply telling people, don't do this or that does not work. The only answer is to point them to Jesus Christ, who is the only refuge that will not destroy us. But the Federal and state laws have always been specifically fashioned to do exactly that. (<https://soundcloud.com/ghostwars/ocean>)

34. However, despite my caution about legislating morality, as Patrick Carnes succinctly states "all addiction is limited by opportunity." The fewer casinos, the fewer gambling addicts."

Our founding fathers unquestionably crafted our laws off of the Bible (which is the yard-stick of sanity and sound policy making). The government of the United States recognizes the importance of having checks and balances by having three separate branches. This is because the human heart is vile (to include mine by the way - see this lawsuit - but to a different degree that Apple's and HP's executives are - see this lawsuit). The heart is the well spring of life. It deserves protecting. The laws of our states and Federal Government were designed to make it harder for business to allow the public to access things that are damaging physically and spiritually, regarding what we ingest through our mouths and eyes. Our laws were crafted so that the public will take refuge in a relationship with God through His son Jesus, not in things like Apple's and Hewlett-Packard's pornography machines. Our laws nudge us towards Jesus. I'm am asking that Apple and Hewlett-Packard redesign their products to nudge us away from pornography addictions.

35. Counterintuitively, merciful God, and by extension our government, wants the public to have the right to not choose Him so that they can see that refusing to do so does not work. If people are bent on rebellion against God's way, they should have the right to rebel within some reasonable parameters. To err is human. President Obama's approval rating is dropping, not because he is a bad guy or incompetent, he is extremely intelligent, but his administration is a total failure because his policies goes against God's way of doing things. The first lesson of politic science is "American Pragmatism," which means if it is working do not fix it. President Obama and Eric Holder have never even heard of such concepts. They are have no leadership skills. It is not "Morning in America." It is dark. They are not qualified for their jobs. When any leader puts man's ways before God's there is terrible consequences. This is the message from

History. There is no way around these fixed principles of Universal law that the United States relied on at the Nuremberg trials.

36. So it is for these reasons that an absolute band on pornography is not demanded, although the Apple and Hewlett-Packard porn is more dangerous than traditional forms and should be more heavily regulated because it is creating a prostitution epidemic in America. I am against prosecutions were ever possible. People should not be prosecuted for being human, and this action is designed to cut back on the number of prosecutions. The law prefers prosecution from the top down, not from the bottom up. (I think that some of the most evil people in the world are prosecutors because of lack of accountability over them has made their heart's vile, and the United States Supreme Court has raised this same concern repeatedly). Pornographers, unquestionably, have a Constitutionally protected right to make and distribute some forms of porn to adults, who seek it out, regardless of whether engaging in that activity will have terrible consequences for them and others. This right should not be taken from them entirely, just the time, place, and manner of this collaboration must be restricted to comply with obscenity laws and products liability tort.

37. Therefore, Apple and Hewlett-Packard can rejoice in the fact that given what the British Prime Minister and I propose, Apple and Hewlett-Packard may retain their right to partner up with their fellow pornography predators once again to carry out their mission to create addicts, but this continuation of destruction can only commence, if the purchaser is over 18 and takes the steps to seek permission to having the filters removed by obtaining a password from Apple and Hewlett-Packard after providing proof of their age. (This program is offered not as just a

suggestion, the program is offered to break the Defendants secret alliance with predatory pornographers and to keep their addicting products from being defective).

38. If a purchaser over 18 asks to have the filter remove, Apple, Hewlett-Packard, and their porn collaborators can hunt down these individuals with all the tenacity they can muster. But Apple and Hewlett-Packard have a duty to give their adult customers that choice. I did not have that choice my life and millions of other suffered because of it. In this case, I did not choose to opt in to pornography, to opt into my life through an intentionally defective designed product and false advertising campaign through hopelessly greed technologists, who are have been convinced that they are immune to the laws of the United States. Apple and Hewlett-Packard have virtually admitted this deliberate design flaw, but mistakenly believe that because of their political ties, they are beyond the grasp of accountability. Apple and Hewlett-Packard have set out to create addicts in the exact same way that the Tobacco companies did, using similar tactics like failing to warn their customers. (See mold and asbestos litigation were the Plaintiffs did not know that they were breathing in these toxins). My Apple and Hewlett-Packard devices were sold to me without any filters. I was literally stalked down by pornographic predators who scammed me into interacting with their content that reeked havoc in my life personally and inflicted me with a terrible addiction that drove me to the door step of prostitution before I sought help to figure out what was happening to me. Christian counseling saved my life.

39. Make no mistake, I love sex, in hindsight I just preferred having it with my precious wife, over my Apple and Hewlett-Packard's products. But I bought my computer for work purposes, not sex, but I tricked into an unsuspectingly vulnerable situation were my senses were targeted

and overloaded by the joint effort of pornographers and the Defendants. I was duped by Apple and Hewlett-Packard's assurances and tricked into interacting with porn sites, thanks to the initiatives of their pornographic collaborators. This has to stop now in compliance to with the rule of law. All of us have a duty to stand up for women and children. For the sake of our children, for the sake of our marriages, for the sake our union, for the sake of love, for the sake of peace, for the sake of innocence, for the sake of Christ - the Defendants must be forced to forbear. If the President and Eric Holder will not do their job, they must be removed immediately. Those who join me in this lawsuit should recognize that is it a love letter to our wives, daughters, and granddaughters. The United States polices must give the populace the opportunity to experience the only meaningful currency this world offers - love and intimacy between member of the opposite sex.

(Until recently, the goal of American law has always been to protect these kinds of relationships.

To suggest that there are any other forms of relationships that are equal is to discriminate against all traditionally married couples and to treat them like second class citizens. No relationship is like it nor worth protecting. Purity is worth protecting)





40. GOOGLE'S RESPONSIVENESS TO THIS LAWSUIT IS AN INDICATION OF
APPLE'S AND HEWLETT-PACKARD'S INESCAPABLE CIVIL AND CRIMINAL

LIABILITY: I filed this lawsuit originally in June 2013. (Wasn't the original complaint cute? I got to thrown in a music video to draw out Apple's true character: <http://www.youtube.com/watch?v=mxJK9F0SHuQ>) The original complaint was designed to be ridiculed by the self-absorbed and liberal factions in the media, which it was because they are not on the side of the truth. *(1 Corinthians 2:14: But people who aren't spiritual can't receive these truths from God's Spirit. It all sounds foolish to them and they can't understand it, for only those who are spiritual can understand what the Spirit means.)* The mockery that my lawsuit stirred up created a landscape for government leaders to be responsive, as I set forth sound legal arguments cloaked in triggers to provoke our leaders to bring Apple, Hewlett-Packard, and all other device makers to stop to terminate this sexual holocaust and assault on intimacy.

To my great disappointment, our pathetic Commander in Chief and Eric Holder, who think their ways are superior to God's, did not respond whatsoever. It was very Gangsta of them not to. However, the British Prime Minster did respond, thanks to the media's bad faith intent. *(You intended to harm me, but God intended it for good to accomplish what is now being done, the saving of many lives. Genesis 50:20)*



41. Thanks to the British Prime Minister's resolve that "enough is enough" and with the help of his outstanding staff, Google has already been responsive, making it harder for child pornography images to pop up in their search engine. Having deleted millions of pornographic images, Google's efforts deserve some applause. Yet, Google will need to do more. Google

should understand that most perverts do not set out to conduct internet searches for child porn. There is a digression that shifts appetites into that kind of perversion that is not automatic. Yet, any effort to make porn harder to access is advancing the interest of families and children (even if it is done for ulterior motives, like to make Android look less family friendly). However, for purposes of this case, Google's responsiveness is nothing short than an indictment on Apple and Hewlett-Packard. In a phrase, "The Heat is On," as Glenn Frey sang in the 1980s. The question is will Apple and Hewlett-Packard be responsive to the demand of the British Prime Minister to join a joint task force with the United Kingdom, or will it insist that I drive them into insolvency and command executive responsiveness through all available legal means, while we watch Apple and Hewlett-Packard hang themselves in the process? Google's responsiveness does not absolve Apple and Hewlett-Packard's duty to comply with child obscenity laws and the laws that bar the distribution of child pornography, it underscores it.





42. SUPERCEDING CAUSALITY AND "BUT FOR CAUSATION" RENDERS APPLE AND HEWLETT-PACKARD TO BLAME:

Let us not forget that a person cannot access "Google" without a device like the ones the Defendants make. Google is merely a sum of their parts. An Apple and Hewlett-Packard customer cannot access google without having the power supply, mouse, key pad, software, and connectivity provided by the Defendants. Apple and Hewlett-Packard are first in line the process of pornography addiction, which goes into effect before the product leaves the plant and

continues after the device leaves the retail store. Google's responsiveness does not absolve Apple and Hewlett-Packard of their legal and moral obligations, just because Apple and Hewlett-Packard think their brand name makes them above the law and better than everyone else; they have been hauled in the District Court for being chiefly responsible for my injury as well as millions of other people's.



(Press here to start your sexual addiction reward cycle).

43. AFTER FILING THE ORIGINAL COMPLAINT AND SINCE THE BRITISH PRIME MINISTER TOOK ACTION, WE HAVE LEARNED:

The British Prime Minister stated that since he has take action, ISPs, computer companies, and search engines, who were saying that nothing can be done, are proving that something in fact can be done! The British Prime Minister said that if device makers and ISPs were working with law enforcement, instead of against them, they could bring about real change for the better. This is true even if it messes up Apple's and Hewlett-Packard's alliance with predatory pornographers.

44. The good people in our community do not want their neighbors looking at porn

preferably because it puts their family members at risk as well. (This whole argument about to each his own, was the one that the Nazi's made in carrying out the death camps, and the same "ends justify the means" position that Eric Holder and Obama are conducting in assaulting traditional marriages.) Any prosecutor who has prosecuted child obscenity offenses will tell you that reasonable people of ordinary prudence do not want members of their community looking at hardcore pornography. The British Prime Minister recently said that his administration is working "in lockstep with the Americans" on this computer porn problem. But were are the Americans? What are the FCC and Eric Holder doing in response? What are the device makers doing to comply with the laws in the United States and the United Kingdom? Where is our leadership? Where is our morality?

45. While it is true that Google in America is being responsive, Eric Holder is part of the problem not the solution. He is on the Obama bandwagon to destroy traditional marriage in our country to promote a certain class of sex addiction that is equally as rotten as porn addiction, but not equal to traditional marriage. Eric Holder has not prosecuted a single obscenity case, since Obama took office. The British Prime Minister demanded that he wants prosecutions, but the Department of Defense in America is a complete joke. They have created a complete state of nature, when it comes to the criminal misconduct of these Defendants. The Department of Justice is standing idly by an allowing Apple and Hewlett-Packard to carry out their concerted effort with to rake in millions at the expense of our communities, children, and innocence by welcoming predatory pornographers to hunt us down and exploit the fact that we are sexual beings and that us guys are stimulated by sight. The Inspector General's office is run by democrats, so they are not holding the DoD accountable, as a result democracy in the United

States suffers. The people suffer as a result of men who elevate their ways above God's way and the American way. (It is as if President Obama and Eric Holder are inflicting a certain form of payback back for the civil rights movement through reverse racism, which serves to undermine the civil rights movement itself - it warrants impeachment).



46. **LAWYERS/PROSECUTORS WITH CHARACTER:**

Alan Sears and Patrick Trueman, two former prosecutors, who I greatly respect, have correctly pointed out that since President Obama has come into office, not a single case has been prosecuted through the Department of Justice. (I do not point that out because I am political. I am not - neither Republican nor Democrat. Here is a video of Pat Trueman and Alan Sears talking about this matter: <http://www.youtube.com/watch?v=3wGyghdwOk0>. Patrick Trueman had a 99% conviction rate in prosecuting obscenity laws, when he was heading a federal task force at the Department of Justice. Alan Sears' points to research that shows that the prosecution success rate in the United States is in the 90th percentile, when it comes to obscenity law violations. Meanwhile Eric Holder has done nothing, since Obama came into office. He has not prosecuted a since obscenity case with is truly obscene. It is as if he hates America. When it comes to sex issues, Eric Holder's job is to enforce the law, not destroy it like he did when he conspired with the President to destroy DOMA with the help of 5 black robbed Supremacists on the United States Supreme Court. 6 key political figures are waging war on our families, and Apple, Hewlett-Packard, and pornographers are cashing in on it at our the expense, while posing a risk to National security interest. These prosecutors must be unleashed to protect our women and children. I'm calling on the FCC to respond.

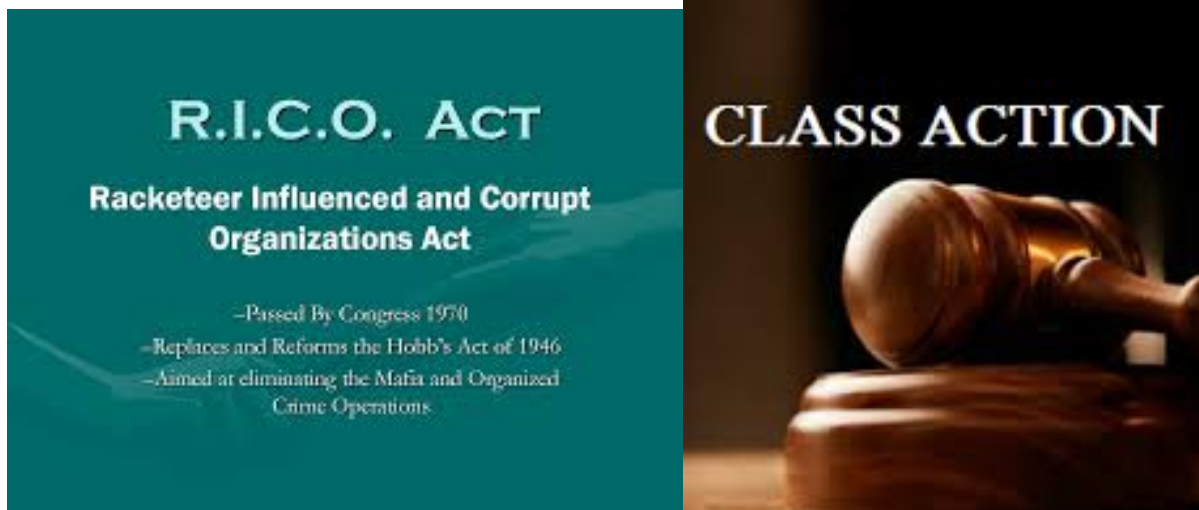


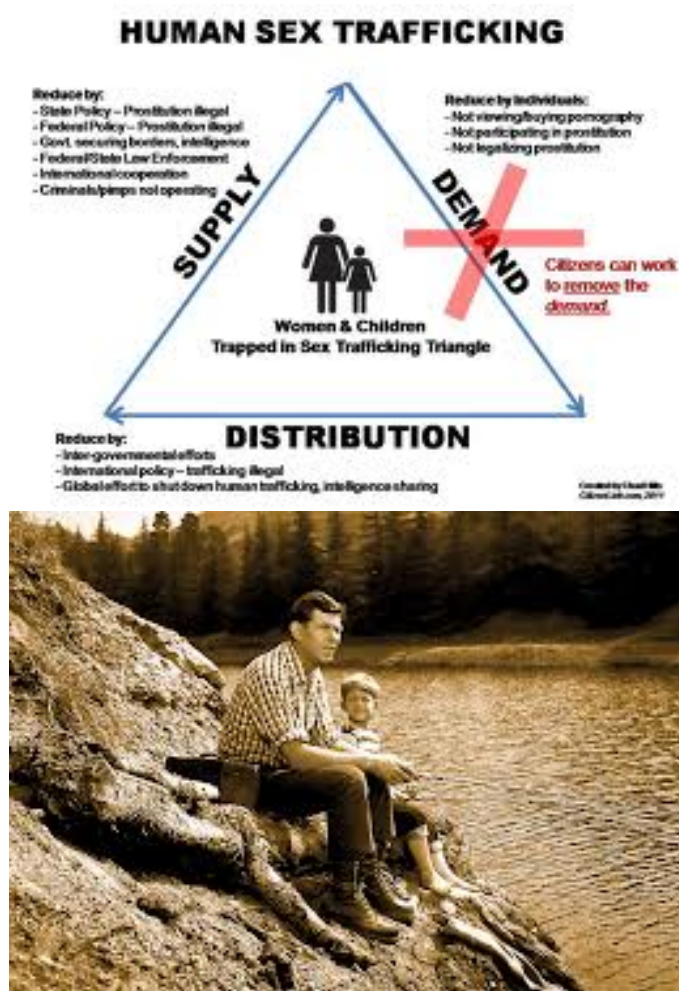
47. **"LAUGH NOW CRY LATER" RICO CHARGES AND CLASS ACTION LAWSUITS**

ARE IN APPLE AND HEWLETT-PACKARD'S FORESEEABLE FUTURE: If Professor

Ford has a modicum of ethics, she should be running to her clients and telling them that if they do not give Chris Sevier what he wants, they best be studying up on RICO statutes and class

action lawsuits. This is not because I am special. I am not. It is because neither Apple nor Hewlett-Packard are more special than the law. Political winds tend to swift, once man's ways have proven to fail. And that is all true no matter how fancy the Defendants think the iPhone 5 is. There is a shift coming because lack of enforcement of the law over Apple and Hewlett-Packard destroyed the music business, wrecked photography, and generated a prostitution and sex trafficking epidemic all in the name of process. Its outrageous. I want to see our Nation take back sex, take back art, and take back our lives by boxing in these Defendants who are sucking intimacy and creativity out of our world. I wish that the hearts of Americans were more inline with how they were in Andy Griffith's day - where families and relationships mattered and innocence was protected, not attacked in the name of progress.





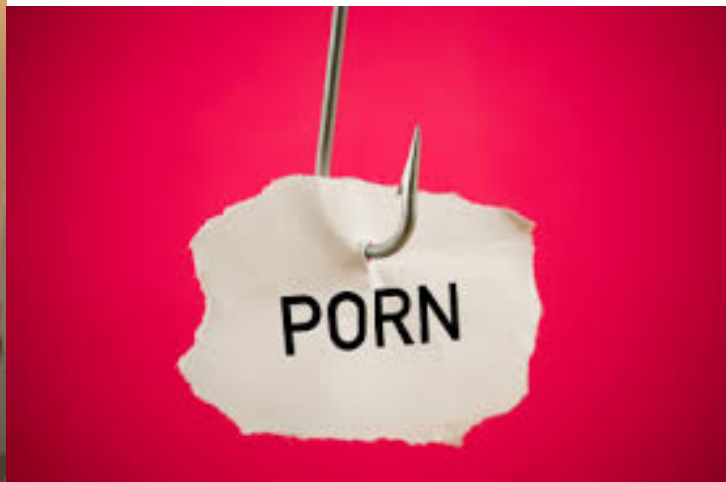
HUNTED BY APPLE AND HEWLETT-PACKARDS PORNOGRAPHY AGENTS - F!@#

\$CKBOOK AND CREAM PIE - WERE THE TIP OF THE ICEBERG:

48. As stated in the original complaint, I state again: misspelling "Facebook" and doing a search for "cream pie" lead me into porn sites that overwhelmed my ability to resist temptation and infected me with addicting content. But it is also primarily case that I stumbled into addicting pornographic websites by typing in innocent keywords using Apple's and Hewlett-Packard's keyboard, which tricked me into clicking on their sites which I was working on something else. (I clicked on these sight by the mouse given to me by Apple and Hewlett-Packard.) Some porn

sites literally use Christian names. I once did a word search for Sarah Palen and landed on a Sara Palen look-alike- site that was designed to reel you and and introduce you to porn. There were also ads pop up ads that seemed like they were for one thing but were actually for another - to get you hooked to porn sites. Adult friend finders is a classic example of that occurring. As an "amateur model," I would get messages inviting me to modeling pages, which were hard core pornography sites. Nearly any time I was tricked into clicking on a porn site, Daisy-chaining occurred, in an endless line of sites from which it is very difficult to extricate yourself. (the technical terms for this is mousetrapping"). I was sent pornographic spam from random email addresses, asking me to click on a real-estate ad, which turned out to lead me to a hard core porn site. All it takes is interaction with porn site once to trigger an addiction in the same way that for some people on snort of cocaine is all it takes to lock them into an addiction.





49. Upon information and belief, all of these tactics employed by predatory pornographers were encouraged, sponsored, authorized, and ratified by Apple and Hewlett-Packard. Apple and Hewlett-Packard want their customers to become addicted to online porn because it makes them codependent on their products, and ask any drug dealer - addiction is good for business.



50. **CONCERT EFFORT**: The fact that (1) Apple and Hewlett-Packard refuse to sell their products on safe mode; the fact that (2) Apple and Hewlett-Packard say they are against porn and take some measures to combat porn without real impact; the fact that (3) Apple and Hewlett-Packard receive thousands of complaints from parents about what porn is doing to their families;

the fact that (4) Apple and Hewlett-Packard go to such great lengths to market themselves as "family friendly manufacturers," when their refusal to take action shows that they are not; the fact that (5) Apple and Hewlett-Packard know they are distributing the worlds largest source of highly addicting pornography; the fact that (6) the evidence suggests that Apple and Hewlett-Packard are not being prosecuted for violating obscenity laws because they sponsor politicians like President Obama, who selectively enforces the law; the fact that (8) the evidence shows that Apple and Hewlett-Packard are literally in business with predatory pornographers, shows that Apple and Hewlett-Packard are chiefly responsible for the tactics that the predatory pornographers used to such me into the dark addiction of online pornography. The fact that no one else will confront them, has influenced me to confront them at every level until the terminate their alliance with predatory pornographers and protect our women and children.





51. FELONY MURDER LAW (THE LAW OF INTENT) AND HOW IT APPLYS TO APPLE AND HEWLETT-PACKARDS CIVIL AND CRIMINAL LIABILITY IN THE DISTRIBUTION OF PORN TO MINORS AND THE PROLIFERATION OF CHILD PORNOGRAPHY AND SEX TRAFFICKING VICTIMS:

In the United States if a group of people conspire to commit a felony, like robbing a bank, and in the process one person dies, all of the robbers are guilty of felony murder(first degree murder) this includes not only the robbers who went into the bank, but the get away driver, and the people who masterminded the robbery.

52. This analogy applies to the pornography enterprise, which Apple and Hewlett-Packard are the masterminds. The conduction of their device and combined with their false advertising, such as "freedom from porn" shows this entirely. Because Eric Holder is well aware of this criminal enterprise that is leaving our daughters and children at risk, while threatening traditional marriages, he is culpable for abuse, mismanagement, waste, and non responsiveness. I foresee America dividing in half, not republican and democrat, but into Christ Follow and non-christ follower factions. The Christ followers will always invite the non-Christ followers to joint them, but the non-Christ followers, cannot tolerate Christ followers because we are on the side of the truth. *(Jesus answered, "I am the way and the truth and the life. No one comes to the Father*

except through me. John 14:6). I would have hoped that after filing this lawsuit and the British Prime Minister called upon our Country to join a joint task force with the United Kingdom that Eric Holder would have had the integrity to jump all over that opportunity. Instead, he has done nothing, which is outrageous. We need responsiveness from the Department of Justice or we need the rascals outsed.





53. APPLE AND HEWLETT-PACKARD SUPPORT THE "FREE SAMPLE" TACTICS OF STREET DRUG DEALERS IN ASSISTING THEIR FELLOW PREDATORY PORNOGRAPHERS TO CAUSE THEIR CUSTOMERS TO BECOME CODEPENDENT ON THEIR PRODUCTS: Once I was tricked into porn sites, nearly all of them present me with free samples. This is like how a crack dealer will give a potential client free samples so that they will get hooked and become their slave. This is not like the free sample we get at whole foods. The free samples that the Defendants sponsor and that drug dealers offer have an adverse impact on brain chemistry and dopamine levels. Apple and Hewlett-Packard did not warn me that these sites could cause me to suffer from a controlling addiction that ruled my life. The primary difference between the drug of pornography and a drug, like molly, is that one is administered through the eyes and the other through the mouth. Both are organic orifices. Apple and Hewlett-Packard encourage the distribution of these free samples because they are the primary beneficiaries. Apple and Hewlett-Packard want their customers hook on porn and codependent on their products to deliver the fix. They are the cartel bosses and pose a threat to the human race

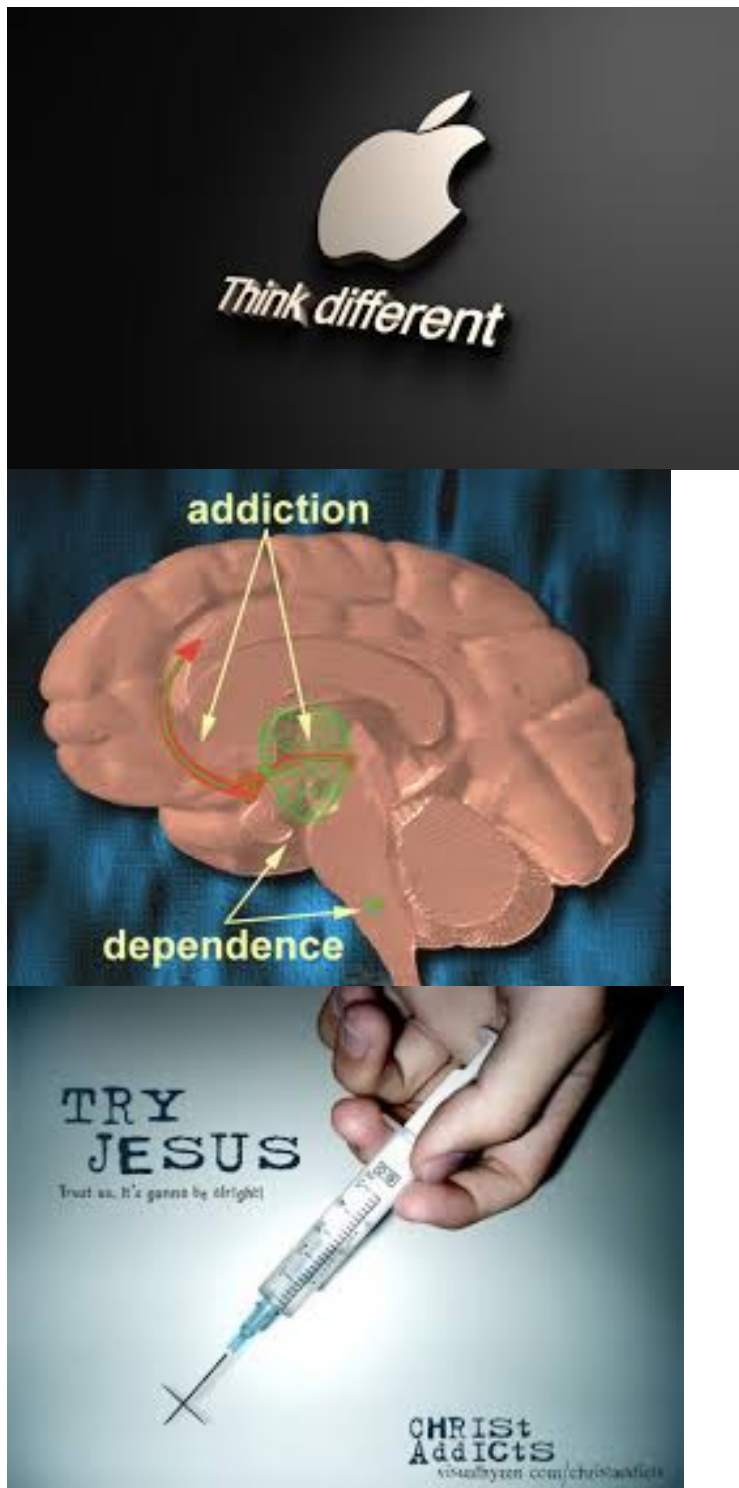
by selling dangerous products.



54. APPLE SLOGAN "THINK DIFFERENT:" Apple has a slogan "think different" that is relevant. It wants the public to think different about its criminal violation of obscenity laws. It wants their customers to think differently so that Apple will become their master. In short, Apple wants people to think differently in a way not to help themselves, but to enable Apple to maximize their personal profits at the expense of their client. In applying their motto "think different" in context of how Apple has refused to stop predatory pornographers from attack us, their slogan offers a particular insult to injury. There is nothing to think about. Apple is selling us

a dangerous product that is inflicting us with addiction, turning us into slaves, and ramping up prostitution in the name of person wealth. In Rhetoric, Aristotle spoke of "the old speech and the new speech," that is an on going debate in every society. Since the dawn of time communities shift back and forth in this debate. The entire old testament is a story of the the israelites turning towards idols to save then only to realize that the idol is a counterfeit and they come running back to God and embrace the old speech. The old speech refers to traditional values. The new speech associates with hedonism. Lady Gaga, Ke\$ha, Macklemore are ministers of the new speech in our modern times. Apple and Hewlett-Packard have presented us with products that become idols. Miley Cyrus and the late night viagra commercials are the result of their fraudulent pornography distribution system that I am here to blow the whistle on. For the sake of Christ, this must stop.

The only speech that works is to develop an actual relationship with Jesus Christ. He is the one who taught humanity to think differently, not Steve Jobs. He said things such as "love your enemies, and pray for those who persecute you." He welcomed prostitutes and the poor to be part of His kingdom." If you want to "think differently" come to know Jesus, he will meet you were you are at in life. If you want to think like a drug addict, by a filterless Apple and Hewlett-Packard product.



55. HP'S SLOGAN "AQUIRE" SHOULD BE CHANGED TO "ACQUIRE PORN ADDICTION" GIVEN THEIR COLLABORATION WITH PORNOGRAPHERS AND

THEIR DEFECTIVE DESIGN: HP's slogan "acquire" should be modified to "acquire porn addiction" or "acquire porn addiction and criminal charges." The defective manner in which HP sells their products, given their ties to predatory pornographers whose scams they ratify, sets up their customers to acquire a rewiring of their brain in an adverse sexual manner. Their fraud should not go without accountability. The only thing that gets acquired in purchasing the HP in the condition that it is in is that HP, through the assistance of their pornographers, end up "acquiring you." You become a slave to their machinery, and that's exactly what they want.



a c q u i r e





56. PROBABLY MY FAVORITE OF THE FRAUDULENT SLOGAN'S IS HP'S "AUTONOMY"

After suffering extensively from HP's products, it is nearly a miracle that they would be foolish enough to name their product "Autonomy." Given their relationship with pornographers and their knowledge of the potency of their addictive content, Hewlett-Packards products offer anything but autonomy. They offer slavery. Personal slavery to the point that it drives an industry of sex slavery. Sex slaves are not free. Neither are slaves of addiction. The poor souls sitting in prison right now because they bought an HP, got hooked on porn, and got into child pornography are not feeling very "autonomous right about now." HP's "autonomy" slogan is no different than the line in Kill Bill 2, when Larry, the strip club owner, tells a stripper, "*Take a hit. Be somebody, baby*" as he offers her a line of cocaine. (see <http://www.youtube.com/watch?v=tkyMee7KB5Y>). HP is offering a drug of their own "computer pornography." Exactly like Cocaine, computer pornography allows its victims to numb out. It rewires the brain for addiction. Like any common thug drug dealer, HP is telling their prospective customers that their products will "set you free." But only in having a relationship with Jesus Christ can we be set free. (*Then you will know the*

truth, and the truth will set you free." John 8:32; There is salvation in no one else! God has given no other name under heaven by which we must be saved." Acts 4:12) The sexually dissatisfied public and the victims of sex slavery will rise up and rally behind the volumes of science being released that show that the pornography that Hewlett-Packard is distributing is a potent drug with crippling implications that leave its victims wrecked and desensitized. When I bought the HP computer, I was influenced by their false advertising, and I'm here to reclaim my autonomy, along with everyone else's autonomy they misappropriated.





57. **NO WARNING = RATIONALIZATION**: The Defendants know that when their customers are introduced to the new drug of computer pornography, there are so many ways to rationalize it. First, its supposedly legal, as communicated to everyone by Eric Holder's defiant non-responsiveness. Second, the view feels as if they are not hurting anyone because the sex acts they are watching is between two consenting adults. Third, there are no warning that this content is hijacking the viewers capacity to form bonds, desensitizing them, restructuring their reward cycle adversely, ravishing them with arousal addiction, triggering stimulation addiction, and fostering sexual compulsive behavior. Forth, the Defendants know that their unsuspecting customers will not know that the porn they have provided is leading them to act out in ways that could cause them to go to jail and face tremendous public humiliation. Yet, Apple and Hewlett-Packard know that the logical conclusion of pornography is more extreme forms of pornography, and ultimately, prostitution and sex trafficking. The Defendants know that they have exposed their clients to a digression that has the potential to lead them from regular porn into fetishes, homosexual porn, bestiality, gang bangs, torture porn, and criminalize child pornography in search for the high. Apple and Hewlett-Packard are the ones manufacturing child predators by distributing there drug, and yet, we are finger point at people who are symptoms of their

outrageous conduct instead of prosecuting the distributors? Such activity places Apple and Hewlett-Packard above the law and defies every precept of American justice. This calamity of injustices must be brought to an immediate close. The Defendants are well aware that the pornography they distribute and promote is an advertisement for prostitution, and Apple and Hewlett-Packard are the greatest pimps of all, profiting the most of all on this addictive marketing plan (why shouldn't they do this there has been no accountability over them from the FCC or Department of Justice). Apple's pornography conditions its victims to "think differently." It causes them to learn that the end result of of pornography is prostitution. Porn teaches its viewer to get straight to the point with women - have sex cause it feels good. Women are not built like that. They want to be loved and cherished, not treated like an object to ejaculate on, like a blow up doll. Apple's porn teaches you to think differently about escorts, prostitutes, sex trafficking, and risk taking. It teaches you to have contempt for the law. (I think there are a lot of police officers, Judges, and prosecutors who are addicted to computer pornography, which is twisting their respect for the law as well).





(Depraved Hearted state Officials - Jane Waters, Nancy Jones, Tennessee Supreme Court)

58. HP porn teaches you that it is worth the risk to sleep with a prostitute even though you might "acquire" a failed marriage, sexual transmitted disease, or a prison sentence. Computer porn makes sex in our brains all about getting off and numbing; this is no different than the goal of crack. As Alanis Morissette sings in "All I Really Want," "I need now is intellectual intercourse. A soul to dig the hole much deeper." That is what HP's and Apple's pornography distribution scam does. It digs a deeper hole inside of us, leaving us void and empty, and craving more. It underscores the existence of the God shaped void that only Jesus Christ can fill.

Apple and Hewlett-Packard not only must pay to fix this design flaw, they must be pay out to all of the sex trafficking Christian organizations who they provoked to fix the systemic problems their greed has produced.

**APPLE'S CHRISTMAS COMMERCIAL THAT WAS RELEASED AFTER THEY WERE
SERVED THIS LAWSUIT EXPOSES THEIR FRAUD, HIGHLIGHTS THEIR
HYPOCRISY OPENLY, AND UNDERScores THEIR PARTNERSHIP WITH
PREDATORY PORNOGRAPHERS**

Lying lips are an abomination to the Lord, but those who act faithfully are his delight. Proverbs

12:22

59. In attacking the merits of this lawsuit, the Defendants have asserted that my allegations in the original complaint failed to meet plausibility requirements of purposes of 12(b)(6). My claims for fraud are plausible by merely evaluating how Apple and Hewlett-Packard have acted after they became aware of this lawsuit. There is a saying in the military, "give an wicked hearted opponent enough rope, and they will hang themselves." The most recently Apple Christmas ad captures the fraud that Apple is inflicting on society that I fell victim to perfectly - with convincing clearly. (Here is the commerical: <http://www.youtube.com/watch?v=v76f6KPSJ2w>). For years, Apple has been falsely marking themselves as being pro-family and pro-family values. Yet, this recent Christmas ad goes out of its way to show a teenager boy, who is loaded with testosterone, who is more interested in his Apple product then in his family around him (I can relate). It shows that the male is isolated, probably because he has been masturbating to porn on his iPhone (brought to him by the fraudulent collaboration of Apple and their pornographers); the boy is presumably now more bonded with his Apple product than his physical family members (like the guys who sleep with blow up dolls - see the documentary "Guys and Dolls"). Incredibly, Apple's Christmas ad, which is laughably designed to be "a family tear jerker," came out after the filing of this lawsuit and after the Defendants were served process. They were aware of this action and the issues raised. The ad was released after the Defendants were called upon

by my rule 68 proposed offer of settlement and the British Prime Minister to sell their products in a safe condition that protected the families and the minors they are targeting. Apple balked at these demands because it is in bed with predatory pornographers, and because my demands will interfere with their drug dealing aspirations.

60. Apple's ad is a slap in the face to this Court and all of the victims of their dangerous products. The ad combined with Apple's noncompliance with the law despite the direct notice served on them constitutes willful violations. They are, therefore, subject to maximum punitive damages. This ad directly supports the theory of the case. The ad confirms the story that Apple's paramount marketing strategy is to target families, only to then subjects them to pornography predators, it commissions, by refusing to sell the products on safe mode. Apple's commercial features an isolated boy with his Apple product which was sold to him without filters in direct violation of child obscenity laws. They are flaunting their violations of the law before this Court. Apple must be held to strictly account under products liability tort. Apple and Hewlett-Packard must be required to pay out billions of dollars to the organizations that are fighting sex trafficking in "clean up." This is false advertising. Punitive damages are demanded(See Exhibits).





61. One former Apple executive stated regarding the Christmas commercial: *"Ever see a company spend nearly half of its holiday commercial depicting the downside of its own product? Apple has done just that — painting the picture of a kid seemingly more interested in the virtual world of his iPhone than the family around him."* (thank you for making the point for me). If Eric Holder was actually interested in protecting families like the one shown in the Ad instead of destroying them, he would use the Ad as exhibit A in a trial against for their continuous violation of child pornography and obscenity laws. (See Exhibits). <http://www.businessinsider.com/apple-ad-guy-christmas-ad-2013-12#ixzz2qixMpGBq>

62. In April 2010, Steve Jobs admitted, "**we do believe we have a moral responsibility to keep porn off the iPhone. Folks who want porn can buy and (sic) Android phone.**" Steve Jobs made this omission, as an authorized agent on behalf of Apple, and it does not get much clear that Apple admits, acknowledges, and understands that it has an affirmative duty to not sell a product that amounts to an "electronic box of smut and other data." Yet, in keeping with a pattern of fraud, Apple made that statement as a marketing ploy: suggesting that the public should buy their products, and Android's because their products are safe. (It appears that Steve Jobs, from the grave is one my side, now that he must be realizing that this life is not designed to be all about money - but it is about love, intimacy, faith, and family). Apple was sending the message the public that "if you want to buy a family friendly and safe device, buy our products, not our competitors like Android and HP, who presumably also have the same moral duty, but not care about honoring like Apple does." This Court must allow me to impose maximum punitive damages on the Defendants to be paid out to Churches and sex trafficking organizations across the Nation to undue this unimaginable fraud they have perpetrated on our great Nation.





63. Yet, even though Apple was posturing that their devices were porn free by blocking porn Apps, nothing could have been further from the truth. First, Apple still sold their iPhones with the Playboy app, which is the poster child of a porn apps. So, their dishonesty is inescapable. Second, Apple devices still were sold with Safari, which amounts to the greatest porn App of all time. One could access more porn on Safari than any single porn app a million times over. Hypocrisy on this level and the directly false marketing ploy warrants severe punitive damages to remind these out of control companies that they are not better than the people of the United States of America. They must be reminded that they are not above the law. They must be required to pay out to the hundreds of Christian organizations that are fighting on the front lines of sex trafficking every day to clean up the end result of this devastating onslaught of dishonesty.



64. In calling out Apple in their hypocrisy, an article came out entitled, "*Apple, 'There's Pornography On My iPhone. The App Is Called Safari. YouMade It.'*" The article falls into the business record exception to the hearsay rule and is self-authenticating. The article states: "*hypocrisy with regard to the App Store is something I know well. Several times last year I wrote about Apple allowing apps like "Asian Boobs" and upskirt apps into the App Store while rejecting things such as satirical apps that mocked public figures. It was ridiculous. So you might think I'd be happy that Apple is now rejecting and removing sexy apps from the App Store as well. But actually, the hypocrisy is much worse now.*" The article goes on to directly exposes

Apple's fraud, listing four essential ways that Apple is fooling the public into thinking that their products are safe. (See Exhibits)

65. The author lays out four problems. In regards to problem number 4 the author states:

"Problem number four is perhaps my favorite one. Apple is going through all this trouble of removing these apps, and creating more work in scanning for the next sexy apps to reject, when built into every iPhone and iPod touch is not one, but two huge entry points for explicit material — and both are apps made by Apple themselves. The first, I alluded to above: iTunes. There are no shortage of films and TV shows with nudity and sexual content (along with violence and everything else) that are available on iTunes for purchase on the device.

But the second app is far worse: Safari. Each iPhone and iPod touch has a web browser that is more than capable of accessing any site on the web with a few clicks. This includes sites with hardcore pornography, or anything else a teenage kid can dream up. Apple is going through all this trouble to block sexy apps (which have never contained nudity, by the way, just sexy pictures), when they offer one of their own that makes it much easier to find far more sinister content. As long as people keep voting for Apple with their pocketbooks, Apple will continue to do as it pleases, hypocrisy or not."





66. Meanwhile, where is Eric Holder? He is nowhere to be found. So, what has occurred through these kinds of fraudulent misrepresentations is that people like myself were misled to our extreme injury, and groups like A21, Fight The New Drug, Pure Intimacy, and thousands of Churches have to pick up the slack - creating two Americas - the believers and the nonbelievers. Our Country is going to get torn apart by the lack of leadership.



67. **PORNOGRAPHERS AND STRIPPERS ARE GOING TO TESTIFY AGAINST
APPLE AND HEWLETT-PACKARD IN THIS ACTION AS TO THEIR DIRECT
PARTNERSHIP IN THE PLAN TO TURN THE DEFENDANTS CUSTOMERS INTO**

ADDICTS: Oh, but wait, this is just the tip of the iceberg, upon information and belief and evidence I've received after filing this lawsuit, there are stripper and pornographers, who are stepping out of the shadows and offering to testify at trial that Apple and Hewlett-Packard paid them directly to entice Americans to become addicted to sex and porn so that they would become codependent on the worlds largest distributor of the drug pornography "Apple and Hewlett-Packards" products. Apple is in bed with predatory-pornographers sponsoring content like "Sex is fun" and promoting sexual content on iTunes, which entirely erodes their public face of being pro-family and highly moral, when in fact they are greedy, degenerate, and without accountability. They must be strictly required to undo the damage they have done to me and the world. I call upon all state attorney generals to help me take out Country back from Apple, Hewlett-Packard, and all other device makers. I am asking that our elected officials "think different," "acquire" integrity, and help me take our "autonomy" back.





68. ERIC HOLDER CANNOT PROSECUTE APPLE AND HEWLETT-PACKARD FOR OBSCENITY LAWS BECAUSE DOING SO WILL CONTRADICT THE EFFORT TO HIGHJACK THE EQUAL PROTECTION CLAUSE AND FORCE SAME SEX

MARRIAGE ON THE UNITED STATES:

For the record, science shows that there is no gay gene. But science of dopamine demonstrates that people will bond with "whatever" or "whoever" they have sex with - beast, inanimate object, member of the opposite sex, or member of the same sex. Gay people are merely sex addicts, who are lying to themselves and trying to get others to believe their lie so that they will feel less guilty about their inherently shameful conduct. Human beings have a remarkable ability to lie to ourselves. If the United States Supreme Court sees gay people as a separate class (as the President and Eric Holder insisted in Windsor), all Federal Courts must see those who are bonded to their computer, pet, and blow up dolls as a protected class under the 14th Amendment. To fail to do so would be considered bigotry, under the logic of same sex proponents like A&E. The United States' Courts will be guilt of the same bigotry that the United States Supreme Court painted President Clinton and the House and Senate with because they passed DOMA to protect gays from discriminating against traditional marriages, which are not equal to other forms of sexual unions, in an effort to inflict their treacherous lies onto our society.

69. Apple and Hewlett-Packard are proponents of gay sex, not because it is an equality issue, but because they want to create as many sex addicts as possible. Sex addicts get high off of the computer porn that they deliver. "Think differently" and "acquire" is an understatement when it comes to their view of sex addiction/pornography addiction. Apple and Hewlett-Packard's products are the greatest sex shops of all time. Apple, which rarely comments publicly on anything, made an exception after the Windsor case ruling, issuing a statement: "*Apple strongly supports marriage equality and we consider it a civil rights issue. We applaud the Supreme Court for its decisions today.*" Apple very obviously knows nothing about civil rights law, tort

law, or criminal law, but will skew the law to say whatever it takes to maximize their profits. The only thing they understand is greed and the acquisition of power. They breathe lies and are spreading addictions. It makes me absolutely livid. Not because I am a hate monger. But because I oppose any kind of lie that hurts people. Our government's elected officials have a duty to stand with me to protect people from the tyrannies of evil. This true of all government officials from the lowest levels to the highest level. From junior officers to the Commander In Chief.

70. In terms of HP, HP sponsor of San Francisco's gay pride festivities, also came out in favor of Windsor rulings publicly. (This action is set to be consolidated with the A&E lawsuit). Meanwhile, it is patently racist for any self-absorbed person to suggest that the gay-behavior plight is one that arises under the equal protection clause of the 14th amendment. To make this suggestion by Eric Holder and President Obama converts them into modern day slave drivers. They are slave drivers of sex trafficking. And they are a flagrant discredit to the millions of people, who suffered terribly under slavery and the civil rights movement. How dare they or Apple disrespect Martin Luther King and all of the evangelicals who sacrificed their lives to create produce the Civil Rights Act of 1964. (Today is Martin Luther King Day as it turns out). Apple, Hewlett-Packard, Eric Holder, President Obama, and similar types, then misconstrue the Civil Rights Act of 1964 to use as a sword to discriminate the hundreds of millions of traditionally married couples in the United States. Such a activity warrants incredible contempt, political reprisal, and punitive damages. These greedy, deprave hearted bigots are the greatest bigots in modern history. They are not on the side of truth. They are on the side of power, greed, and evil. They must be stamped out through the force of law. We must cry out collectively "No

More!"



Do I need to say more?



71. APPLE ATTEMPTED TO DISTRIBUTE PORN TO CHINA AS PART OF THEIR

FRAUDULENT GREED CAMPAIGN BUT CHINA WAS NOT PUTTING UP WITH IT
THEIR COLLABORATION TO SPREAD THE DISEASE OF PORN ADDICTION TO
THEIR NATION:

To demonstrate the plausibility that Apple is holding itself out falsely as a "safe" and "pro-family" manufacturer, Apple literally attempted to inflict China, (with its population of over billion) with the cancerous disease of its special concoction of pornography (like it has through most of the world). It is a virtual miracle how easily tables can turn. America is supposed to be the champion of human rights in the world, and here is is China, who has a history of violating human rights, taking an affirmative stand against sex trafficking by telling Apple that it does not want to expose its population to its perilous pornography. It warrants Congressional and prosecutorial responsiveness.

72 In September 2011, some people in China began complaining that Apple was promulgating pornography there. According to Communist Party of China mouthpiece People's Daily Online, a man rang up China National Radio to complain that he downloaded an app that contained "sexually explicit written material." The app, provocatively titled "18 novels forbidden in the Ming and Qing Dynasty," contained content that "annoyed" his family. (And, a search turned up no English translation of this content in iTunes). Li Qiang, professor with the Chinese Academy of Sciences, told the radio that the offending content is a crime, according to a 2010 judicial interpretation on pornography dissemination in China, and called for a "public prosecution" of Apple. An Apple spokesperson told CNR that the content carries a warning that it is "only suitable for adults over 17." "In a country that has zero tolerance toward pornography

dissemination, we won't accept the rating system at all. Apple can't use American laws to treat the problem in China," Li said. This could be an interesting conundrum for the Cupertino company after the famous "freedom from porn" declaration and all the flip-flopping on adult content in the iTunes U.S. store. (See Exhibits). Notice for the record that China did not accuse "the internet" of distributing porn the disease of pornography. No, the Chinese correctly named Apple (and its complete indifference towards humanity) as the culprit. Because of this outrageous maneuver, Apple must be held to account for its fraud and crimes against humanity. The only driving principle behind Apple is to maximize profits at all cost. This is the same principle that Tobacco Manufacturers were guided by. Accordingly, Apple and Hewlett-Packard deserve to meet the same fate as Tobacco manufacturers. Professor Ford might have convinced herself that she is the smartest attorney alive, but I wish her good luck getting around Apple's attempts to infect the entire Nation of China with their particularly toxic brand of pornography. If Eric Holder was actually a man of integrity, he would prosecute Apple's executives into the stone ages with a team lead by prosecutors like Pat Trueman of Morality in Media.

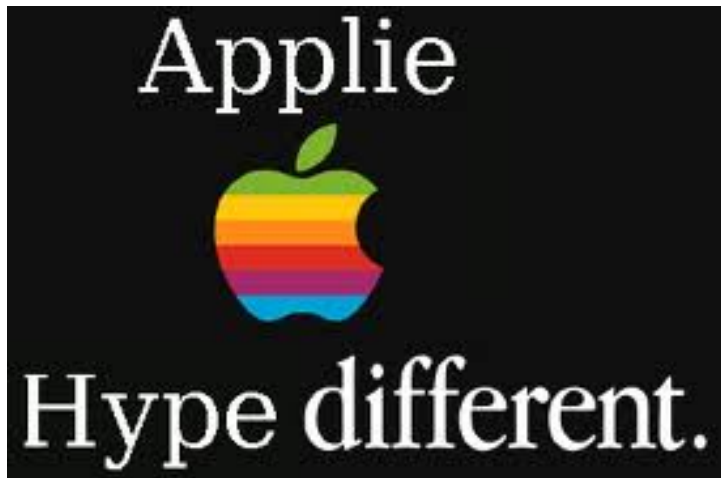
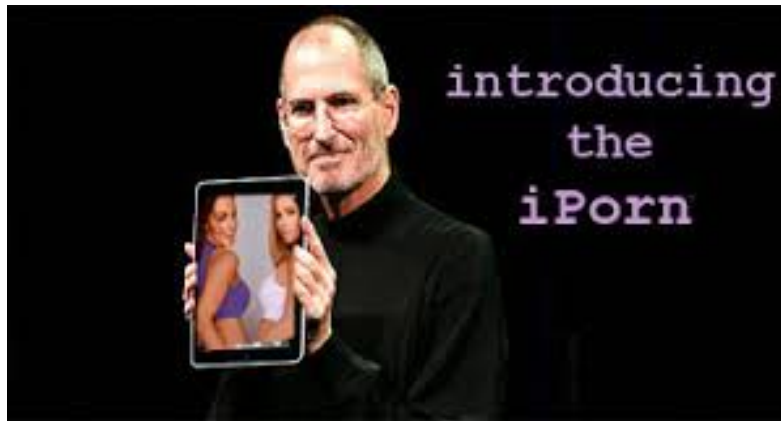


73. STEVE JOBS LITERALLY LAUNCHED A FREEDOM FROM PORN CAMPAIGN

JUST TO FURTHER MISGUIDE THE PUBLIC: Another huge bastion of Apple's fraud is embodied when Steve Jobs began to champion "*Freedom from porn.*" As one business journalist wrote, "*Freedom from porn. Yep, freedom. The times they are a changing. The techi customer stated: 'I don't want 'freedom from porn. Porn is just fine!' To which Steve Jobs replied, 'You might care more about porn when you have kids...'*" In the article, Apple expressly acknowledged its duty to protect kids from pornography. Yet, when faced with my lawsuit and the demands of

the British Prime Minister to implement a solution to protect "kids" that Apple and Hewlett-Packard pretend to be so concerned about it has refused and gone on the attack - because compliance would disrupt their concert effort with pornographers to make these "kids" addicted to their products. Then the author went on to write a personal response to Steve Jobs' freedom from porn remark showing that he himself had been duped stating: *"parenting changes your perspective on many things. Having children, grandchildren or just knowing and loving other's children adds a whole new dimension to the way we view life. We want to shield our kids from the filth, the trashy side of the real world. If Steve Jobs is blocking porn, than I am buying Apple products from here on in. I think it's important to support the companies, the businesses and the people who are standing up for the things that you believe in. The best way to support any cause is to put your money where your mouth is, and purchase their products. I will support Apple in this latest endeavor. The question is: Will you?"*

Very obviously, Steve Jobs false posturing that he was taking the moral high ground by block porn had its desired effect on millions of people to include the sophisticated writer of the business article. The only problem is that the "freedom from porn" statement was a complete fabrication of the truth. Apple's products remained the worlds leading distribution of the most addicting kind of pornography ever introduced to the world. The Defendants are not computer sellers. They are drugs dealers who market to kids and falsely advertise to ensnare their customers to become codefendant on their brand of drugs.



<http://www.youtube.com/watch?v=mxJK9F0SHuQ;>

<http://www.youtube.com/watch?v=aVXmzZdRcNE>

74. Despite this outrages "freedom from porn" lie, the fact that Apple would resist my demand here exposes the lie all the more and warrants total accountability, under strict liability. I now want ever Apple product pulled from the shelves and a system in place to ensure "freedom from porn" in fact, not in jest.

75. It was the spirit of the false advertising of "freedom of porn" that impacted me when I was purchasing their products as an unsuspecting victim. I was ensnared by that kind of dishonesty and manipulation, which sent me into the throws of pornography addiction and would have left me crawling on all fours, if I had not ran to the church and other government organizations for help.





76. When I bought the Defendants products, I asked their agent if I would be hurt in any way whats so ever. He said "no." I asked if I would be subjected to unwanted addiction, he said "no." The clerk did not tell me that the product he was selling me was different than the way it was marketed and portrayed. I was tricked, misguided, mislead, exploited, duped, and injured as a direct result of this fowl dishonesty that cloaked their malicious greed. I was fooled by the spirit of the false advertising campaigns and slogans. Hamilton County Emergency Comm'ns Dist. v. BellSouth Telecomms., LLC, 890 F. Supp. 2d 862, 878 (E.D. Tenn. 2012) (quoting Walker v. Sunrise Pontiac-GMC Truck, Inc., 249 S.W.3d 301, 311 (Tenn. 2008)).

77. I relied on the Defendants misrepresentation to my extreme detriment.

78. **ITS IS NOT JUST MY OPINION**: Apple and Hewlett-Packard have literally defended by suggesting that it is just my personal opinion that their products are offer addicting content that

proliferate the demand side of sex-trafficking and child porn. Once again, they are dead wrong. It is not just my opinion that Apple and Hewlett-Packard's special kind of pornography is addicting and damaging to the reward cycle. It is the opinion of the Witherspoon Institute, Patrick Carnes, and nearly every Psychiatrist, Psychologist, and physician practicing in the modern world, who has any semblance of integrity, and does not work for Eric Holder and the Defendants. The pornography that Apple and Hewlett-Packard are distributing through the aid of their commissioned pornographers is one of the worst new drugs introduced to human kind since the foundation of the Universe. In the Garden of Eden, it all began with an Apple, lust, and lies, and here we are coming back full circle. Apple and Hewlett-Packard are not advocates of progress. They are proponents of dishonesty, greed, and self-absorption. The expert testimony will demonstrate that Apple and Hewlett-Packard are directors of a sexual holocaust that has crippled our world and threatened the well-being of humanity at large.

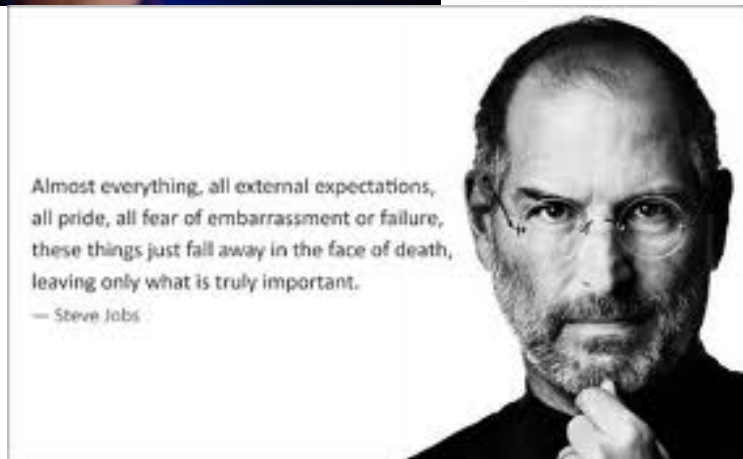




(Leading Experts The Witherspoon Institute, Dr. Patrick Carnes, Dr. Phil Zimbardo).

79. Upon purchase, I believed that Apple and Hewlett Packards products were safe because I was put at ease by their false advertisements and manipulative marketing. I did not know that in merely putting their device to use as they were intended, I would be aggressively hunted down by their pornography predators they exposed me to and forced into a crippling online porn addiction that destroyed the quality of my life irreversibly. Its not just my opinion that this has happened to me alone. There are hundreds of men at "She's Somebody's Daughter," who have stepped out of the shadows to tell about how Apple and Hewlett-Packard porn devastated their lives and wrecked their families. The fact that these Defendants have demonstrated zero remorse

in this action, but have only managed to confirm their indifference to their duty to follow the law is borderline miraculous. These Defendants are exactly like my opponent in other cases before this Court, Celebrity Apprentice Winner John Rich, who believes that he can openly break the law and get away with it because he is "John Rich." It is a virtual miracle that Apple, Hewlett-Packard, and John Rich, sincerely believe that this Court, the 6th Circuit, the United States Supreme Court, the jury, and the public is dumb enough to fall for their outright dishonesty, fraud, and criminal misconduct.





80. **ADDRESSING THE UNREASONABLE ELEMENTS REGARDING APPLE'S AND**

HEWLETT-PACKARD'S ASSERTION: In response to my lawsuit, Apple and Hewlett-

Packard say that I am being "unreasonable." But what would be unreasonable would be for

Apple and Hewlett-Packard to suggest that (1) they played no part the demise of my family and

millions of others through their unparalleled fraud; that (2) they don't have the technology to

make their computers nearly smut free, as they promised to the public through patently false

advertisements; that (3) the manner in which their computers are sold is not placing pressure

marriages, creating addiction, and altering brain chemistry adversely (like cocaine); that (4) kids

are not using their devices as the primary mechanism to access porn (causing the Defendants to

violate child obscenity laws); that (3) they cannot define porn; that (5) they have a Constitutional

duty to protect porn even through the 14th and 5th Amendment does not apply to non-state

actors; that (6) they do not believe that the porn that they are distributing is highly addictive; that

(7) they have a right to secretly capitalize on the false notion that their devices are porn free

through false advertisements; that (8) they are having no impact on the escalating demand side of

child pornography and sex trafficking; that (9) they have not been false advertising; that (10)

they do not have a duty to follow the law because computers are special products, that (11) they

are not making a killing off of backs of pornographic predators and porn addictions; that (12) they are not subject to the same laws than movie threatens and porn shops because they "think differently" about themselves; that (13) they are not entrenched with predatory pornographers and welcome their aggressive tactics; that (14) they are not at the helm of a criminal enterprise in distribution of pornography to minors; that (14) they are protecting free speech by distributing the most addicting form of pornography ever known to mankind; that (15) they are not having an adverse impact on sexuality and the way men and women see each other; and that (16) they are immune to prosecution because they contributed to the Obama campaign and support gay sex as well as equally as they promote sex with their products. Some how, Apple and Hewlett-Packard have managed to convince themselves that the are not under the legal obligation to card minors before they allow them to leave the store with the device in the defective conduction.

Miraculously, Apple and Hewlett-Packard have managed to convince themselves that they do not need to warn their adult customers about the scams of their fellow pornographers, who will proactively work to cause them to sample their highly addictive drug. No it is not I who am unreasonable. It is they. And in response to this unreasonableness. I demand that all of Apple and Hewlett-Packard products be recalled and repaired to cure this malignant defect. I demand that they be forced to pay out trillions to reverse this sexual holocaust they have started. I want to see Apple and Hewlett-Packard make a public apology and full confession to the public for their incredible narcissism. I want to see each and every executive at Hewlett-Packard and Apple arrested and prosecuted for creating the largest pool of victims in the modern world.



82. Apple not only failed to warn me that I would come into hardcore pornography even though initially I did not want to. It failed to warn me that I could become addicted to the kind of porn that they distributed and that I would become codependent on their products because they have a malicious financial incentive not to tell me these truths.





83. PROFESSOR FORD'S 3.3 VIOLATION OF CANDOR TO THE TRIBUNAL: I'M NO "LAWYER DOG" LIKE HER WHO PROSTITUTES HERSELF OUT TO THE DEFENDANTS TO ENCOURAGE WIDESPREAD PROSTITUTION AND SEX

TRAFFICKING: The Defendants cannot even get the fact that I am not an attorney correct. As Sheriff Kimbel stated in "Young Gun" when facing Billy the Kid and the Regulators, "I'd rather drink turpentine and piss on a brushfire [than engaging in the practice of law]." For example, take our very own Professor Sara Ford and Tom Wiseman, who are "lawyers," who are literally advancing sex trafficking, child pornography, and the destruction of traditional families, as they attempt to justify Apple and Hewlett-Packard. These lawyers are not just defending against me. They are hoping that Apple and Hewlett-Packard are able to continue (1) violating child obscenity laws in every state, (2) violating liability tort law, (3) decimating lives, (4) wrecking homes, (5) perpetrating fraud, (6) objectifying women, (7) highjacking their uses capacity for intimacy, (8) exposing their customers to predatory pornographers, (9) subjecting customers to devastating porn addictions, and (10) imposing an undue burden on law enforcement all in the pursuit of the almighty dollar. They are scoundrels. Lawyers who put women, children, and law

enforcement at increased risk at a gross disservice to the American Bar association. They have contempt for the law. Here I am protecting police officers and crying out for innocence, and these lawyers are vicious enough to attempt to justify their clients behavior in the face of mountains of evidence highlighting their inescapable liability. No, I am not like them. I am not some prostitute-dog-lawyer. Those would be Apple's and Hewlett-Packard's advocates. If Steve Jobs could speak from the grave, he would inform these lawyer here that money is not everything, that this life is short, and that we cannot take our possessions with us. ("Your money perish with you." Acts 8:20.) This world is not our home, we are passing through. *(For this world is not our permanent home; we are looking forward to a home yet to come. Hebrews 13:14)* *(Matthew 25:41 "Then he will say to those on his left, 'Depart from me, you cursed, into the eternal fire prepared for the devil and his angels.)"*





84. APPLE'S LAWYERS ARE PAID TO ENGAGE IN BACKFIRING DISHONESTY,

DURING WHICH THEY HAVE RATIFIED THE LOWER PLEADING STANDARD: As

is always the case in ever action I appear in, my opponents employ arrogant attorney's who literally are paid to provide cases that serve to directly undermine their position. Its nearly miraculous. (NOTE: "People who set traps for others get caught themselves. People who start landslides get crushed. Proverbs 26:27). I am not anything like the "pro se attorneys" referenced in this cases provided by the Defendants: Smith v. Plati, 258 F.3d 1167, 1174 (10th Cir. 2001); Olivares v. Martin, 555 F.2d 1192, 1194 n.1 (5th Cir. 1977); Friederichs v. Gorz, 624 F. Supp. 2d 1058, 1063 n. 5 (D. Minn. 2009); Richards v. Duke Univ., 480 F. Supp. 2d 222, 234 (D.D.C. 2007). Those cases involve licensed attorneys who were proceeding pro se. They are not comparing apples to apples, and have supplied cases that literally demonstrate the lower pleading

standard. (Thanks Apple). Yet, out of an abundance of good faith and kindness to help wake up these wretched Defendants to "think differently" about the fate of their company, I'll amend the complaint so that they can stop wasting my time and this Honorable Court's time with their sanctionable 12(b)(6) motion that literally is an exhibit that highlights their fraud and dishonesty. Apple and Hewlett-Packard are going to need more than a Christmas commercial to recover from this action. Apparently, Apple's and Hewlett-Packard's own attorneys gorge on the same life-style of greed that they do, and are going to attempt to bill them as much as possible in this action, despite being fully aware of their horrific liability. Before this case is over, I will have Apple's and Hewlett-Packard's attorney's disbarred for their continuing violations of the rules of Professional Responsibility. Just take my word for it, when I say that the Tennessee Supreme Court and the Board of Professional Responsibility for the State of Tennessee owe it to the people of our state and Nation to honor my humble request that they be responsive and reactive against anyone who would dare oppose my demands in this action.

85. **COUNTERING APPLE'S AND HEWLETT-PACKARD'S BIZARRE MISCHARACTERIZATION THAT I "LOVE THEM;" WHILE THAT IS NOT THE CASE, THERE ARE THINGS THAT I DO LOVE**: Lets be crystal clear. In the motion to

dismiss, Apple and Hewlett-Packard stated that "I loved them," in the original complaint, as if to justify their crimes against humanity. I do not love Apple or Hewlett-Packard. Originally, I admit that I wanted to give these arrogant defendants a final chance to cure their defects so that now when I move for punitive damages for their willful defiance, my request shall be granted in full.

86. There is a saying the military, "you catch more flies with honey, then you do vinegar."

Presentation is important. The original complaint might have reflected those principles. But Apple and Hewlett-Packard are the lord of the flies, Beelzebub. They have committed crimes against humanity and should be held accountable in all international forums. So anyone with common sense can see that my true feeling is that I would love it if the U.S. Attorney's office and state district attorney's office prosecute Apple's and Hewlett-Packard's executives for acting in concert with porn predators to distribute porn to minors in violation of child pornography laws and child obscenity laws. I would love it if Apple and Hewlett-Packard were required to pay out trillions of dollars to the hundreds of anti-sex-trafficking organizations popping up across the globe in response to their greed and narcissism. I will love it when the BPR holds Apple and Hewlett-Packard's lawyers for their dishonesty, as they play there roll in combating sex-trafficking, and I will love it when the United States Supreme Court makes Apple and Hewlett-Packard comply with my demands. I will love it when Eric Holder is fired for mismanagement and abuse. Only a fool would believe that I have anything other than contempt and scorn for Apple after their dangerous product reeked havoc in my life and the lives of millions of others. Steve Jobs himself admitted that "geniuses do not borrow ideas, he steals them." This was his justification in single handedly ripping apart the Copyright Act and the laws of the berne convention, sucking creativity out of the world, and leaving artists without the ability to monetize their works of art, establishing "Franchise America." The world has never had more incidents of child rape then after Apple and Hewlett-Packard executed their fraudulent crime against humanity by shoving the drug of computer porn before our eyes. They was recently a 10 year old boy, who had a mac book, who was looking at porn for years. He decided to act out what he saw on a female. The law would command that on behalf of the little girl, Apple should

be prosecuted for child endangerment. I will love it when the rule of law is governing our Nation again. I will love it when our Nation turns its hearts back towards God of the Bible.



87. THERE WAS ABSOLUTELY A FIDUCIARY RELATIONSHIP ESTABLISHED

BETWEEN MYSELF AND THE DEFENDANTS: I am not a computer science major, neither are the vast majority of people who buy the Defendants products. I have no education on electronics whatsoever. Only a slight minority of Apple and Hewlett-Packards customers have the technical expertise that they have. No group of people know their way around the electronics of their own products like Apple and Hewlett-Packard. The Defendants have teams of technical staff and technicians at their stores - literally called "Geniuses." It would be flat-out-dumb for Apple to suggest that their geniuses did not establish an unbalanced fiduciary relationship with myself in selling me their defective product. I was wowed by the Defendants electronic expertise and false presentation professionalism and caring. Meanwhile, these technicians are in bed with drug dealers (predatory pornographers). I am not a psychologist and psychiatrist. I had NO idea that the computer pornography that their partners would shove down my throat was an addicting drug.





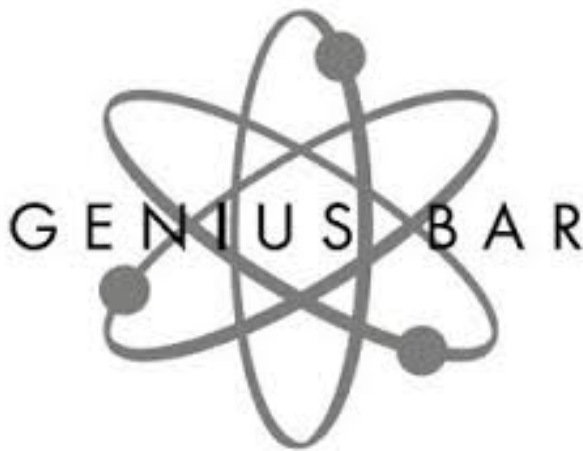
88. **IT IS A GENIUS DEFENSE FOR APPLE TO ASSERT THAT THEIR GENIUSES**

ARE NOT SMART WHEN FACED WITH PRODUCTS LIABILITY:

In dealing with Apple and Hewlett-Packard's agents, I completely believed that there was a doctor/patient relationship established, a "fiduciary relationship" because Apple and Hewlett-Packard representatives held themselves at as such vastly superior tech experts, who were allegedly pro-family, pro-progress, and pro-advancement of society. The clean-cut presentation highly trained technologist, lulled me into believing that I was buying a safe product that was not defective. I was convinced that I

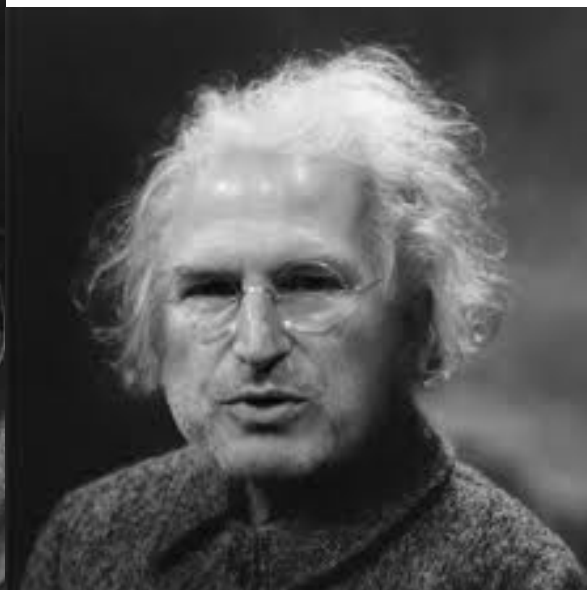
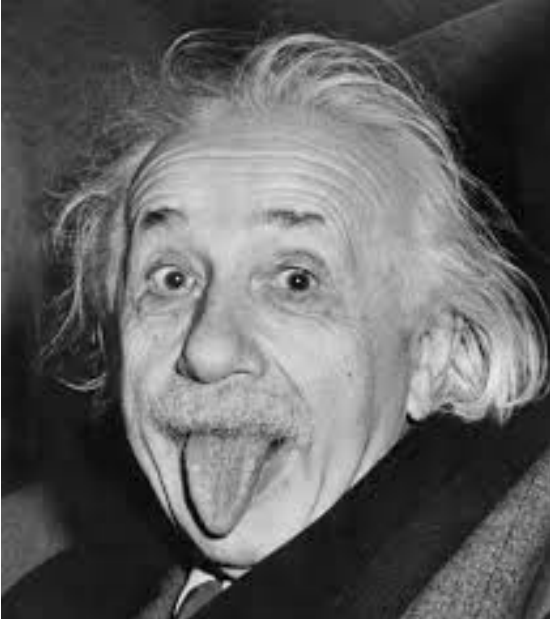
was buying a product by the world's leading technological experts that had more to do with work related activities, not sexual conduct. Their presentation was a facade to a sinister agenda. By their tech savvy presentation, clean-cut appearance, and false professionalism, I never dreamed that the Defendants were in league with pornography predators, who they commissioned to restlessly entice and tricked, me and millions of other males into getting involved in their highly addictive substance - causing us to "think" like addicts. I am sure that many of the Christian Germans in Nazi Germany thought the Gestapo were the "good guys," not knowing that Himmler had every intent on unleashing them on Christians, after solving what they called "the Jewish question" through their "final solution." If good men do not rise up to stand against evil it will continue to metamorphosize into more extreme forms until what happened to Sodom and Gomorrah happens to that society. Apple and Hewlett-Packard employees are in the drug business and are cut from the cloth of evil in selling such unsafe products to minors and young adult males.





89. **FIDUCIARY:** The employees who represent Apple and Hewlett-Packard products have gone through extensive programs to understand the inner workings of their products. They are certified and trained. They are in the best position to mislead customers, like myself, while being in the best position to sell their products in a safe condition. The Plaintiff had never had technological computer training, when he bought the Apple and Hewlett-Packard products. The Plaintiff never thought about putting filters on the computer. He was not told that porn could be addicting or harmful to his life in any way. To meet with an Apple employee, one has to literally

set a meeting, no different than meeting with a dentist, doctor, or lawyer. For the Defendants to suggest that their was the lack of a fiduciary relationship may reflect that they are "not smart," but shows that these Defendants will take any position available to continue their scam operation with predatory pornographers because the only principle they live by is "the ends justify the means." The ends justify the means is the same guiding principle that leads Kim Jong-un of North Korea. "The ends justify the means" has no place in American politic or business rhetoric. We are suppose to put people first because people matter. We are endowed by our Creator and made in His image. To oppress people is to vicariously oppress God Himself.





90. **GENIUSES ARE NOT SMART APPARENTLY**: Only an company as arrogant as Apple would have employees that were so highly trained that they are literally called "Geniuses" only to turn around and allege that their wasn't a fiduciary relationship. Such a pattern of dishonesty is remarkable. The training and certification classes that the Defendants employees go through makes them subject matter experts of the products. A lowly layman like myself, has zero technical skills, could not have possibility been in the position to assume that I was in any form of danger. Not a single employee at Apple or Hewlett-Packard has been prosecuted for violating obscenity laws so how in the world would I have been expected to know that I was being deliberately sold a defective product by a monstrosly greedy pornographic enterprise.



91. **THE "PERFECT GOOD FAITH" ELEMENT WAS VIOLATED BY GENIUSES FOR PURPOSES OF PRODUCTS LIABILITY:** The high price of the Defendants product (well over the \$500 threshold of the purposes of the UCC and contract law in the state of Tennessee) combined with the Defendants false advertising, along with the technical expertise of the

Defendants employs undeniably establishes a solid fiduciary duty. In face of this blatant fiduciary duty, to quote Apple and Hewlett-Packard's lawyer "it calls for perfect good faith." Am. Corp., 330 S.W.3d 166, 195 (Tenn. Ct. App. 2010)).Hamilton County, 890 F. Supp. 2d at 879 (quoting GuestHouse Int'l, LLC v. Shoney's N). Instead, what I received was such a high-level of bad faith and corruption that it nearly makes the Tobacco companies look blameless in comparison. The Defendants campion selling porn free products, yet they are in bed with pornographers, who they commissioned to hunt to down and drag me to a porn addiction that crippled my personal life. Such perfect bad faith in our modern times is virtually unheard of. The degree of bad faith is nearly miraculous, as plead through out this second amended complaint.





92. **INTRINSICALLY FIDUCIARY RELATIONSHIP**: Given (1) the Defendants partnership with pornographic predators, (2) their knowledge that porn was addicting and harmful, (3) their phony pledge to sell "porn free devices," (4) their response in this lawsuit in the face of so much pressure to comply, there is no way that anyone with a straight face can deny that anything other than an intrinsically fiduciary relationship existed. That would be as ridiculous as contending that Eric Holder asserting that he cannot be held accountable by the Inspector General's office for waste, mismanagement, and abuse for being calculating non responsive to such flagrant criminal misconduct.





93. **IN THE FACE OF CIVIL LIABILITY APPLE ABANDONS ITS "FREEDOM FROM PORN PLEDGE" AND JOINS HEWLETT-PACKARD TO SCAPE GOAT THE INTERNET UNDERSCORING THEIR FRAUD:**

One can be held liable for selling computers that connect to the internet because the internet is merely a part of the sum that is the Apple and Hewlett-Packard device. The weight of all products liability law says as much. The internet is not a cube in the desert that glows. The internet is what appeared on my Apple and Hewlett-Packard screen, as I was introduced to

addicting pornography as the Defendants foresaw and prayed in furtherance of a malicious collaboration. The internet was what poured through my Apple and Hewlett-Packard physical product speakers as the porn starlets offered sounds to provoke arousal. The internet was a sum of the part, no different than an engine is part of the car. The car manufacturer has a duty to make sure that the engine maker provides a safe piece of machinery or they could all be held liable jointly and severally. The internet is not a magical unaccountably theory beyond the realm of controllability. The internet is part of Apple's and Hewlett-Packard's devices.

94. Apple and Hewlett-Packards only defense so far has been "we are not liable because we are not liable." Apple and Hewlett-Packard acknowledge their moral and legal duty to sell smut free devices when they are marketing to paying customers, but when they are hauled into Court, they change their story entirely, and shout, "we are not guilty, the internet is." Leaving us to question, what about that "freedom from porn pledge," and "moral duty" when they were trying to distinguish themselves from companies like Hewlett-Packard who are not moral like them?

I think the 6th Circuit and the United States Supreme Court is going to have a virtual field day with these demonic manipulators. Lets see if their argument that we are not guilty because we are not guilty will work on the United States Courts.



Red Herring!





95. EVEN IF APPLE AND HEWLETT-PACKARD WERE TO ARGUE THAT THE INTERNET WAS A SEPARATE ENTITY, THE EVIDENCE CONCLUSIVELY SHOWS THAT THEY ARE IN BED WITH PREDATORY PORNOGRAPHERS WHO ARE PART OF THE INTERNET AND THEREFORE THEY ARE LIABLE UNDER AGENCY LAW

1. Even if the internet, was hypothetically, a separate entity - which it is not - Apple and Hewlett-Packard are still liable because they clearly commissioned and authorized predatory pornographers to hunt down their customers to entice them into ruinous pornography addiction so that they would become codependent on the Defendants product. The evidence of a partnership and agency relationship is overwhelming. Before their products left the plant and before I was injured, Apple and Hewlett-Packard had an implied, ratified, and actual agency relationship with pornographic predators on the internet who they invited, commissioned, and encouraged through every means to do anything within their power to convert the Defendants customers into becoming porn addicts for the Defendants' primary financial benefit. Under the principles of vicarious liability, Apple and Hewlett-Packard are entirely liable, despite their new position of "the internet is responsible." (*Genesis 3:12: The man said, "The woman you put here with me--she gave me some fruit from the tree, and I ate it."*) It reminds me of Hitler blaming the Jews for Germany's trouble, as a way to build up personal support for his evil agenda, which was

centered on the accumulation of power for powers sake. Like Hilter, Eric Holder thinks that his ways of running things is smart than God's way. It will not end well, as long as we have these kinds of depraved hearted individuals in positions of power.



96. **SPECIFICALLY FOR RULE 9(B)**: Specifically around 3:00 in the afternoon on separate day in close proximity to one another in recent times that will be shown in discovery; specially through grossly dishonest advertising campaigns and through the false oral statement of the employees of Apple and Hewlett-Packard, through employees who wore what appeared to be Apple and Hewlett-Packard uniforms and insignia, through stores in Nashville Tennessee located in Green Hills, near white bridge road and highway 65, I was lied to, tricked, misguided, duped, and maliciously pushed into purchasing a dangerous and defective device sold to me by these calculating defendants. Hagen v. U-Haul Co. of Tenn., 613 F. Supp. 2d 986, 996 (W.D. Tenn. 2009); See, e.g., Evans v. Pearson Enters., Inc., 434 F.3d 839, 852-53 (6th Cir. 2006). Their false advertising initiatives, failures to disclose hidden hazards, and flagrant misdirections was the

proximate cause of my injury. Very obviously, given the short and plain statement requirements, I'll provide more information on the details of the fraud as we go through a long drawn out trial on the merits. If the Defendants had sold me the product on safe mode, if the defendants had warned me about the addicting qualities of their computer porn, if they had made me go out of my way to get a pass word to retrieve access to porn, if they had told me that my name would be added to a list, if I had to look an employee in the eye to get the password, if I had to provide proof of age to get the password, I would not have been injured. Apple and Hewlett-Packard new about these hazards and kept the secret. They kept secret their intent and their join effort with predatory pornographers

97. **STATING SPECIFICS AGAIN CONCERNING APPLE TO MEET THE**

STANDARD: In very recent times that discovery will reveal, before my wife left, in a time frame that was without question covered under the cloak of SCRA tolling provisions regarding title 10 service, I went to the Apple store located in Davidson County Nashville Tennessee near I-65 and bought the defective and dangerous product that Defendants had falsely marketed as safe and family friendly, knowing that they were setting me up to be exposed to unwanted addiction.

98. **STATING SPECIFICS AGAIN IN DIFFERENT TERMS TO MAKE IT CLEAR**

REGARDING HP'S FRAUD:

In very recent times, as discovery will reveal, before my wife abandoned me, in a time frame that was without question covered under the cloak of SCRA tolling provisions regarding title 10

service, I went to the HP store located in Nashville Tennessee and bought the defective and dangerous product that lead to my injury. Unknowingly, the product was designed for Hewlett-Packard's predatory pornographers to hunt me down and inject me with a toxic pornography addiction that caused the quality of my life to suffer tremendously. Hewlett-Packard hoped that I would develop a codependency on their products and an chemical dependency on pornography. The statements between the store clerk and I centered around how their device could help my business. There was no disclosures about the hazards of their products. The HP represented was well aware of the hazard but did not warn me at all. The HP store clerk did not disclose its collaborative partnership with predatory pornographers or scams they would engage in to cause me to develop a chemical dependency on their products. There was no warning of any kind regarding the highly addicting qualities of pornography and the damages it can cause to ones personal life and sex life.

99. **PLEADING SPECIFICS FOR THE PURPOSES OF THE FRAUD CLAIM**

FURTHER:

Truthful lips endure forever, but a lying tongue is but for a moment. Proverbs 12:19

When the Plaintiff purchased the products, he asked the Apple and Hewlett-Packard salesmen, as a part of standard operating procedure and prudence, if he could be be hurt by the product. They said "no." The Plaintiff queried whether the device was defect or could place him in danger in any way. The authorized agents of the Defendants said "no." There were no signs or warnings of any kind that the Plaintiff would be mercilessly hunted by predator pornographers that Apple and Hewlett-Packard knowingly welcomed and benefited off of. There was no indication that the Plaintiff would be have trouble voiding images and videos that constituted unbearable and

overwhelming temptation, as they took advantage of the fact that he is a male sexual being, who is stimulated by site and desires to be loved by a member of the opposite sex. This failure to disclose was a material breach by highly trained technicians, who held themselves out as pro-family value types and as subject matter experts on complex electronics that used cutting edge technology. This reliance lead to the Plaintiff's injury. If (1) the Plaintiff was warned, if (2) the Defendants were not holding themselves out as pro-family types, if (3) the Defendants products were not deliberately sold in a defective manner that left the Plaintiff exposed at the mercy of pornographic predators, if (5) the products were sold on safe mode, if (4) the Plaintiff had to take the steps to seek access from the Defendants to see porn, if (7) the Plaintiff were protected from being tricked into seeing porn, if (6) the Defendants were not making so much money off the fact that their customers are being addicted to porn and dependent on their products, the Plaintiff would not have been injured and the quality of his life would have been drastically better. The Plaintiff had no idea that he would be relentless pursued by pornographic predators that Apple and Hewlett-Packard commissioned for their own personal benefit. Only the Defendants knew that information and that is why they have engaged in such elaborate scams. They want their customers addicted to porn and sexually dysfunctional. It is good for business despite the consequences for the customers.

100. NO WARNING OF ANY KIND CAME FROM THE MANUFACTURE - SILENCE IS GOOD FOR BUSINESS - SINCE AFTER ALL APPLE AND HEWLETT-PACKARD WOULD HAVE US BELIEVE THAT SEX IS A PURELY PRIVATE MATTER





Additionally, when Apple and Hewlett-Packard shipped the defective and dangerous product to the retail store, they did not include any kind of warning that their product was designed to encourage sexual predators to trap the Plaintiff into the damaging vortex of Apple and Hewlett-Packard highly addictive porn. Apple and Hewlett Packard failed to include these warning despite the fact that they employ expert technicians, who have an unbalanced relationship with their less tech savvy customers and regardless of the fact that the product was in the Defendants' exclusive control when they shipped off the devices to their retail stores.

101. **JOINT RELATIONSHIP WITH PORNOGRAPHIC PREDATORS; THE DEFENDANTS ARE THE PORNOGRAPHY DISTRIBUTOR MASTER MINDS/ KINGPINS:**





(concerted effort between pornographic predators, Apple, Hewlett-Packard, and the executive branches refusal to enforce sex law because the principles behind it interfere with their quest to impose same sex marriage = discrimination against traditional marriage, divorce, proliferation of sex trafficking, proliferation of child pornography, increased incarcerations for sex crimes on the local level)

Upon information and belief, Apple and Hewlett-Packard have "joint," "symbolic," "implied," and actual relationships with porn marketers and porn content creators. Defendants responses and reactions after the filing of this lawsuit that put them on direct notice of their unlawful conduct, demonstrates the existence of the agency relationship plainly that will only be further exposed through discovered. Apple and Hewlett-Packard disguise their agency relationship with predatory pornographers through false advertising, and making a herculean effort to appear detached from pornographers, when their policies clearly show that they are acting in concert with pornographers to breed addiction for their collective benefit. Apple and Hewlett-Packard authorize, encourage, promote, create, generate, facilitate, incentivize, reward, pornographic predators to exploit the system that they have created to take advantage of the sexual make up of the Defendants' customers (especially young males who are stimulated by site and full of testosterone). The collaboration formed behind the scenes, outside of the public eye, and is

evident by the fact that the Apple and Hewlett-Packard are in possession of the technology to sell their products porn free, but when the rubber hits the road, they refuse to do so because they are making money hand-over-fists off of the addictions they are creating in tandem their authorized porn agents.

102. Proliferating porn addiction is part of their marketing strategy to make their customers chemically dependent on their products by exploiting our biological make ups and providing counterfeit companionship that leave us lonely, devastated, destroyed, addicted, and in extremely turmoil emotionally, spiritually, an physically. The fact that Apple and Hewlett Packard go to such great lengths to market themselves as "family friendly companies" and even go so far as to take propaganda type actions to send the message that they are against online pornography is the precise evidence that demonstrates that they are in partnership, fellowship, and league with pornographic predators, since they have refused to take measures to comply with obscenity laws as any other manufacture and retailer must. Apple and Hewlett-Packard target families and pray for addiction. Like Eric Holder, they change their story to suit their agenda, and think they are above accountability. The Defendants believe that the executive branch will not prosecute them because they make huge donations to the Obama Administration. All of this is incredibly illegal and treasonous. They are at the helm of a world-wide sexual holocaust that grows worse with every product sold.





103. **THE DEFENDANTS' AND THEIR AGENTS KNOWLEDGE AT THE TIME OF**

THE SALE: At the time of the sale, the Defendants knew or should have known the following but intentionally and maliciously kept this information hidden and capitalized on it in order to sell a defective product to the Plaintiff. The Defendants knew that their brand of pornography they were subjecting the Plaintiff too was highly addictive. They knew that their porn created a confusing, frustrating and hopeless experience. They knew that there is more to this than just 'dirty pictures'!"They were aware that pornography addiction is a "chemical addiction" producing a response in the brain very similar to street drugs. They knew that there was a logical, reasonable, scientific explanation behind what becomes their customers struggle. They knew that they were distributing pornography in a way that took advantage of and taps into intense emotional, biological and chemical connections throughout their customers brains and the entire body. They knew that customers, like myself, were "pre-wired" or "pre-set" to switch on at certain times in our development. They were aware that pornography seeks to twist the truth and "mimic" or "counterfeit" this built-in attraction. Its goal is to ignite, excite and exploit these natural built-in urges and desires. They were aware that during sexual process, the brain begins

narrowing its focus as it releases a tidal wave of endorphins and other neuro-chemicals like dopamine, norepinephrine, oxytocin and serotonin. They knew that these powerful chemicals would associate with their products. That is what they wanted. They knew that these "natural drugs" produce a tremendous rush or high. When these chemicals are released during healthy marital intimacy, they are refer to them as "the fabulous four" because of the myriad positive benefits they generate between husband and wife. When they are released during pornography use and other sexual addiction behaviors, they constitute "the fearsome four" due to the severe addiction and many negative consequences they produce in the brain and nervous system. Like the Eric Holder and his boss, the Defendants have been championing the fearsome four. The Defendants new that the pornography they were exposing me to would equate to as "substance abuse." The Defendants knew that the neurochemical release triggered by pornography viewing is so intense, many scientists refer to it as an "eroto-toxin" and the most powerful drug in history. (This is why they refuse to comply with my demands and engage in such wide-spread hypocrisy). The Defendants knew that we live in the most stressful time in the history of the world-there are more than enough pressures to push us to seek escape through many forms of self-medication-both healthy and destructive. The Defendants hoped to be the drug supplier. They hope to replace God in our lives with their products.

104. The Defendants reasoned, "Imagine taking the most powerful drug in history and making it instantly available at the push of a button, at little or no cost. Your drug use is secret, and the drug dealers come to you!" That's exactly Apple and Hewlett-Packard knew they were doing when they sold me and millions of others, to include children, their defective and dangerous product. I did not want to have the opportunity to be exposed to highly addictive porn.

The Defendants capitalized on the "4 A's of the porn they were distributing -Accessible, Affordable, Anonymous and Aggressive. Now Apple and Hewlett-Packard should understand, why some estimates show more than 60 million people in the U.S. caught up in this "drug use" at some level, and why I speak not for just myself, but for these voices in the shadows that grow louder by the day. Eric Holder should understand that I will not desist to compel him to be responsive to this sexual holocaust he has allowed until he is responsive or fired.

105. The fact that Steve Jobs was bragging that about "porn freedom" and "moral duties to keep porn off of Apple's products" tends to show that they were aware of these factors when they sold me their dangerous product. The fact that Hewlett-Packard made a spectacle over firing their CEO Mark Hurd, after a form porn star accused him of sexual harassment, tends to show that Hewlett-Packard had knowledge of these things. It is the over reaction that exposes their lie. Over emphasis to cover up the truth reveals the truth. *(For nothing is hidden that will not be made manifest, nor is anything secret that will not be known and come to light. Luke 8:17; A false witness will not go unpunished, and he who breathes out lies will perish. Proverbs 19:9)*

**APPLE, HEWLETT-PACKARD, AND ERIC HOLDER WERE AWARE AND
CAPITALIZED ON THE 4 A'S OF INTERNET PORNOGRAPHY AND USE THEM TO
THEIR PERSONAL ADVANTAGE:**

**106. WHEN THE DEFENDANTS SOLD ME THEIR DEFECTIVE PRODUCT THEY
WERE AWARE OF THE FIRST "A" -ACCESSIBILITY:**



107. The Defendants knew that they were distributing and subjecting myself to encounter over 4.2 known separate and distinct porn websites, made available at my finger tips, through the normal use of Safari. The Defendants knew that there are 2,500 brand new sites coming online every week. The Defendants were aware that they were selling their products in a manner that removed the deterrent.

108. **Removing a Deterrent:** Before Apple and Hewlett-Packard began ramping up production, for someone to have access to a tiny fraction of the hard-core pornography available today on their machines, they had to slink down to the seedy part of town, stealthily slip into the pornography bookstore or theater, and hope they weren't seen by any family member, friend or acquaintance. That was enough of a deterrent for many who weren't willing to risk their reputation. The fear of having your car seen in the parking lot was enough to keep people turning to God, not porn for relief. Now, in the privacy of home or office, at the push of a button, hundreds of millions of images are instantly viewable thanks to Apple and Hewlett-Packard. Many of these images are of such a perverted nature that they cannot be legally sold in adult bookstores. With this knowledge, Eric Holder, Apple, and Hewlett-Packard do nothing.

109. **Every Fetish or Fancy:** Before Apple and Hewlett-Packard got production ramped up, the variety of pornography most people could easily and anonymously obtain was extremely

limited. They might sneak a peek at a *Playboy* magazine at the corner drugstore, but that was about it. There wasn't enough exposure or variety to get a lot of people "hooked. In addition, many just weren't that interested in the handful of magazines available. Now, however, there exists on Apple and Hewlett-Packard devices every form of pornography imaginable, and much that is so twisted, dark and perverted that it is unimaginable. The point is, any person who buys Apple and Hewlett-Packard's product and puts it to use as it is designed currently will eventually be exposed to some kind of pornographic image that catches his or her attention and can thrust them into the throws of devastating addiction.

110. **Desensitization and Habituation:** At the time that the Defendants sold me the products they knew that the brain quickly becomes habituated or desensitized to the same pornographic images. Simply, it gets bored. Before Apple and Hewlett-Packard, pornographers had a difficult time providing addicts with progressively harder materials while remaining within the confines of the law. Now that barrier has been almost completely erased thanks to the Defendants porn distribution and essential role in the porn enterprise. As the porn user becomes desensitized, he needs more extreme images for the brain to release the same level of endorphins and other neuro-

chemicals. And he is not disappointed. At the push of their buttons, Apple and Hewlett-Packard have give us customers an endless supply of the extreme, the bizarre and the twisted—like a drug addict having access to an infinite supply of increasingly harder drugs. This is great for them, great for the prisons, and terrible for us the public welfare.

111. The Defendants were aware that it's the conflicting messages in pornography that causes the brain and other parts of the body to release the highest quantity and variety of neuro-chemicals. This is why Apple and Hewlett-Packard encourage their pornographers to mix nudity and sex with aggression, submission, violence, incest, molestation, rape, etc. (One form of pornography that has become increasingly popular for its ability to produce an extreme brain reaction is child pornography.) The viewer feels arousal and fear, lust and shock, excitement and shame, a confusing blend of sensations all thrown together into an emotional-chemical cocktail. Apple and Hewlett-Packard provide an unlimited supply of increasingly extreme pornographic material has produced an unprecedented depth and severity of addiction. They then turn around and market themselves as pro-family, and rake in huge profits all because their products are defective and Eric Holder is a sniveling coward.



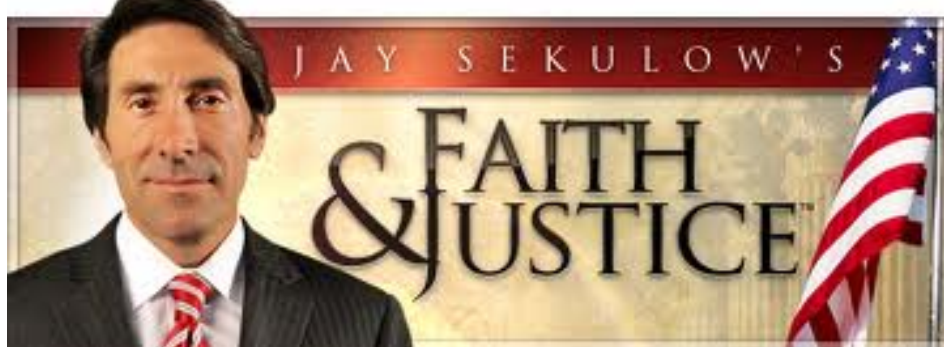
112. Apple, Hewlett-Packard, and Eric Holder are well aware that the Internet is fueling what is known as *copy-cat* crime, where some porn viewers are acting out with and against real people what they see on the Internet. Those who are acting out these copy-cat crimes are victims of Apple's, Hewlett-Packard's, and Eric Holder's non-responsiveness. They are the products our arrogance and greed. Apple and Hewlett-Packard give us Images of acts that are so horrific they can only be described as “demonic are regularly portrayed. These are things no one should ever be exposed to. Now people are not only seeing these images, but some are acting them out. It took Ted Bundy decades to go from a level 1 of desensitization, where as a kid he was checking out *Playboy* magazines at the corner drugstore, to a level 10, where he was brutally murdering young women. How long does it take an individual to go from level 1 images to level 10 in todays smut filled landscape? See the violent crime rate. Instead of attacking the symptom, the British Prime Minister and I am doing Eric Holder's and the President's job by using the force of law to attack the root because we care about humanity and love people. I do not want to see more victims. I do not want to see more people going to jail in the United States. Our jails are vicious and brutal places that are horrible places. I want to ward off prosecutions.





113. When Apple and Hewlett-Packard sell the devices in the condition that they are in that our children are at risk like never before. Prior to Apple and Hewlett-Packard's surge,

pornographers were almost entirely barred from a highly profitable market they desperately wanted: testosterone-saturated teenagers. Today, the largest consumers of Apple and Hewlett-Packard are teenage boys between the ages of 12 and 17. It is not by accident that the star in the Apple's Christmas commercial is a teenage boy. "But wait a minute you might argue. Most of these kids aren't purchasing porn on Apple and Hewlett-Packard's machines. They have to have a credit card." I would respond, Yes and no. . . . Credit card companies are aggressively marketing to teens and some teens are making porn purchases through the Apple and Hewlett-Packard computers. But let's leave credit card companies out of the equation. "Why would pornographers be keenly interested in exposing teens to their wares, primarily by providing teaser images for free?" You're right! Pornographers are drug dealers, and they're no different than the crack dealer on the street. They're willing to give away some merchandise for free to "hook a customer for life. The vast majority of adult pornography addicts that Apple and Hewlett-Packard create were first exposed and hooked as teenagers. Many of the younger generation right now are using Apple and Hewlett-Packard porn as their main source of "sex education and acting out much of what they see. In response, Eric Holder has not prosecuted a single child obscenity case, since Obama came into office, but he has refused to demand DOMA. How is that for a legacy?



You Can Help Save A Girl From Slavery

Help Free for Life win a \$10,000 grant to help girls victimized by slavery.
All You have to do is go and

VOTE for Free for Life International

<http://givingoflife.com/votes>

This grant will be awarded to the organization that gets the most votes.
Get everyone you know to go and vote. Copy this flyer and give it out to
your class, church, group, family and friends. Send this link to all your
Facebook friends. Your vote can set a girl Free for Life

114. Apple, Hewlett-Packard, and Eric Holder were well aware at the time of the sale

that children and teens are especially susceptible to pornographic images due to the immature structure of their brains. Within the brain are the *frontal lobes*, or logic center, where reasoning and discernment take place; and what is called the *limbic system*, where the emotional, pleasure and “gut-reaction responses take place. The immature adolescent brain connection between these two centers is extremely underdeveloped, a clue to why children and teens often “act without thinking. They can behave illogically because the emotional *gut-reaction* part of the brain is in control at the expense of the logical. Imagine what happens when pornographic visual images that already bypass the logic centers enter and are stored in the highly emotional, illogical adolescent brain! This creates confusion, stress and behaviors in children and teens that are only now beginning to be understood. Truly, easy and instant accessibility to pornography through defective, dangerous, unfiltered, and unregulated Apple and Hewlett-Packard devices is wreaking havoc on our society. It is a primary factor in skyrocketing addiction rates, sex-trafficking, and child pornography production. And yet, despite this knowledge, the Defendants do nothing about it.





WHEN THE DEFENDANTS SOLD ME THEIR DANGEROUS PRODUCTS THEY HAD
KNOWLEDGE OF THE SECOND "A" "AFFORDABILITY"





115. The second of The Four A's of Apple's and Hewlett-Packard's marketing scam is *Affordable*. Before the Apple and Hewlett-Packard ramped up production, even if an individual could find access to a variety of hard-core pornography, it was very expensive. This constituted a

deterrent for many. Now through Apple's and Hewlett-Packard's defective product, millions of pornographic images from across the globe can be viewed for free. At first glade, it might seem hard to reconcile how Apple's and Hewlett-Packard's pornographic distribution scheme has made pornography the multibillion dollar industry that it is, when, like music, their content providers and partners are forced to give the pornography away for free.

Yet, these things should be considered about Apple's and Hewlett-Packard's pornography:

116. **Pay Sites:** Of course there are pornographic websites that require payment for access. But these also offer *teaser photos*: an opportunity for Apple and Hewlett-Packard customers to “sample the product before they buy. Most sites provide enough of these teaser photos to keep an individual busy for hundreds of hours on the computer without ever paying a single dime. Why are pornographers willing to give these images away for free? They understand two fundamental marketing principles:

117. **Samples for Free:** Like the drug dealer on the street, the pornographer knows that if he gives away a “taste for free, a certain number will get hooked and become customers for life. (Apple and Hewlett-Packard are all about getting their customers hooked on the free pornography and free music to keep their customers fused to their products). The brain habituates or desensitizes to the same pornographic images very quickly. Pornographers lure the viewer in with tantalizing marquees: “Like what you see? Want to get to the really hard stuff? For only \$6.95 you can have unlimited access to thousands of images for an entire month! Having tasted the “drug, many viewers can’t resist an unlimited supply. How can pornographers make so much money at such a low price? Volume. They only need a fractional percentage of the 60-plus million Americans accessing their wares to make huge profits.

118. **Fetish and Fancy:** A lot of people like to use their Apple and Hewlett-Packard devise to browse the Internet out of curiosity, some actively looking for pornography, and others, not. Pornographers know that if they can expose their images to as many as possible, eventually they will catch someone's interest. Like trolling for fish, they now if they just keep putting out their lure, their particular brand of porn will "trigger in certain viewers a specific fetish or fancy. (Apple and Hewlett-Packard deliberately fail to warn their customers about these hooks and have fraudulently designed their products to have as many fish hooks in the water as possible, only to then pretend to look the other direction). Often times, the trapped individual, like myself, doesn't even realize that he had an attraction to the particular pornographic theme. But mental models are vast, with myriad connections that can be activated by just the right stimulus. If a web surfer begins sampling images that he is especially attracted to, he likely will be highly motivated—even desperate—to get his hands on more of the same. In fact, after exhausting the sample images and then suddenly being denied from seeing more, many users become obsessed and compulsive about it. They just can't get it out of their minds. Usually they give in and pay to gain access to the full site. By not taking action to sell their device on safe mode, it is clear that this is exactly the position Apple, Hewlett-Packard, and Eric Holder want our children in.

119. **File Sharing:** In addition to the pay sites, many people post pornographic images that are accessible on the Defendants products at no cost. Their motives be one of many:

To feed their addiction: The brain is constantly desensitizing to the same types of pornographic images. Thus porn addicts find it necessary to constantly change the theme and up the variety and level of the images. In order to heighten the "rush, some display images, video or live camera of themselves, *exhibitionism* that elevates the chemical release in their systems. Not to

knock Google's efforts, but Google is delusional if they think that people are born as child pornographers. There is a degeneration that takes place. A gradual poisoning of the mind and soul. Its like how Grima Wormtounge's words gradually sends King Theoden into further and further darkness with his poisonous speech, in Tolken's The Lord of the Rings. (Its like President Obama's quest to discriminate against traditional marriage he hates America or because he does not understand the job of the President. To push his gay agenda, he employs gradual methodology. First he repeals "Don't Ask Don't Tell," he unleashes the IRS to persecute Christian organizations; he encourages pornographic predators to make child porn; he emboldens Hollywood to kick start the persecution of Christians; he orders Eric Holder not to prosecute obscenity cases; he conspires with Eric Holder to call upon five black robbed supremacists who set on the United States Supreme Court not to defend DOMA, setting a terrible example for hundreds of millions of Americans.)

To share with a private group: Many use Apple and Hewlett-Pacakard products to distribute a specific kind of pornography among their own private group. This often involves extreme or illegal material such as child pornography, which is made simple because of Apple's and Hewlett-Packard's evil scheming. Unfortunately, the unwary Internet surfer can inadvertently stumble onto some of these sites, when using Apple's and Hewlett-Packard's products as they are currently designed.

To share with friends: The pornography that Apple and Hewlett-Packards distribute is setting a terrible example for children. A growing trend is amateur pornographers sharing images and video clips among friends, either by passing them a CD or via e-mail. Sadly, this sort of activity has become popular among teenagers, and even in growing numbers among some grade school

children. And as impossible as it may seem, a recent trend has some teens utilizing digital photography and video technology through computers, cell phones and hand-held cameras to create and share their own pornography. In 20 years from now, all the kids who posted on "you porn," who have a husband and a kids are going to seriously regret that permanent fixture of them having sex with someone, who they are not married to. Imagine the pressure that puts on their family; how embarrassing this is for their kids, whose friends at school can go see their mother having sex on "youporn." Imagine protective employers running a google search on a possible candidate only to find them having sex on "youporn" on they 18th birthday. Eric Holder, Apple, and Hewlett-Packard meanwhile are in a position to do something to prevent this kind of destruction, but are not failing to act at tremendous cost to the public. The bottom line is that hundreds of millions of pornographic images of every kind are instantly available on Apple and Hewlett-Packard devices at little or no cost, a condition that has never existed in the history of the world. Affordability is a primary factor in soaring porn addiction rates.





WHEN THE DEFENDANTS SOLD ME THEIR DEFECTIVE PRODUCTS THEY HAD
KNOWLEDGE OF THE THIRD "A" "ANONYMOUS"



120. The third of the four A's stands for *Anonymous*. The greatest fear a porn user has is *discovery*—getting caught. Society makes this ridiculous rules, like "the rainbow flag stands for gay." (I will be taking back the rainbow by the times these lawsuits are over with. It belongs to children not those who have been sexually conditioned to a member of the same sex). Another

unspoken rule is that sex is private matter that is not to be discussed. This is why when I filed the original lawsuit, it made international news. Al Jazeera covered it. Every late night comedian ridiculed it. Bill O'Reilly attacked me. A minor read about these cases online, thought that I must be a sexual predator, even though I am fighting against sex predators, and made a false police report, which is a direct reflection of the human heart and the spiritual warfare that is attached to this matter.

Many fear getting caught having engaged with porn than death, often going to great lengths and elaborate means to hide their addiction. Before Apple and Hewlett-Packard mobile devices and lap tops, many were unwilling to "risk discovery, so their viewing of pornography was held in check, acted on intermittently and on a limited basis. Now with Apple and Hewlett-Packards transportable devices, porn users have escaped this deterrent. Now they have access to the *stealth drug* thanks to Apple and Hewlett-Packard's greed and Eric Holder's goal to undermine America.

Simply using their Apple and Hewlett-Packard machines as they are currently designed, users of all ages, including minors, can self-medicate in complete privacy and secrecy. And when the Apple and Hewlett-Packard customer achieves his high through the porn they exposed him to, he doesn't stagger around, slur his words or pass out; after a Apple and Hewlett-Packard porn fix he won't be pulled over and cited for DUI. The individual is able to self-medicate while still maintaining his reputation and outward appearance of propriety in his family, church and community. Apple and Hewlett-Packard are the most surreptitious drug dealers of all time. They are not family friendly. They are thugs. Then of course, the Defendants payout huge donations to the Obama campaign and support all things sex to allow them to get away with this drug

trafficking, which has devastating consequences for our communities, families, and the victims of child porn and sex-trafficking. As Patrick Carnes says, "that which is most private is most public." This addiction does not stay behind closed doors. It converts people its victims into stimulation addicts, deviant thrill seekers, voyeurists with sexual compulsive syndrome, and shame addicts.

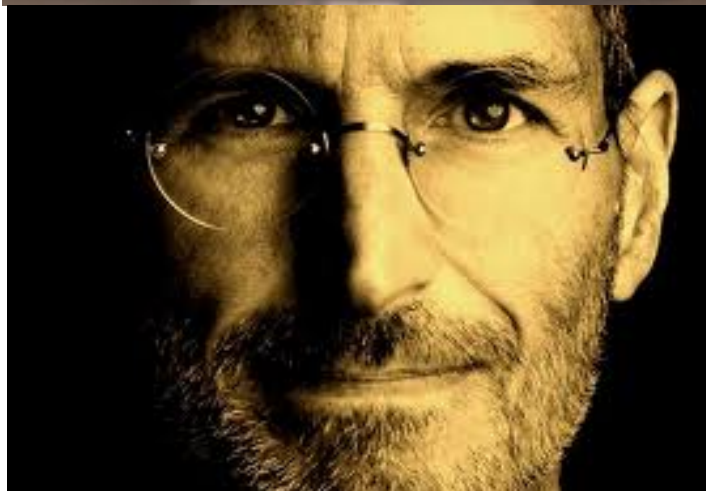
I can attest first hand that this *secret addiction* has become a serious problem in religious communities. Most religious people are working hard to do what's right: love and serve their mate; raise their children in righteousness; succeed in their profession; serve in the community; exercise and eat right; serve in their church. And on top of all this they are dealing with the constant onslaught of evil in the world and the trials of daily living. Many get to the point where they have exceeded their limits, their ability to cope. They're stressed out of their minds! But, being religious and wanting to do right and be well thought of, they wouldn't dream of being seen staggering out of the local bar, caught smoking marijuana, or taking illicit drugs.

Then one day while checking their e-mail, they make accidental clicks and stumble onto a porn site. Curiosity turns to arousal, then to lust, and before they realize what has happened, they get pulled in. Yep, that is Apple's and Hewlett-Packard's plan at work against me. Suddenly, believers discover an easy way to escape the pressures of life: self-medication. All they have to do is push a button on their Apple and Hewlett-Packard device and, at no cost, they have access to an endless supply of this incredibly potent drug. And no one knows they're doing it! They can self-medicate daily and still retain their reputation and standing in their family, church and community. There is no question that if I did not have the church and other forms of community support and government support I would have died.

121. This is how this played out for me. I have NEVER smoked a cigarette. Not once. I have NEVER tried illegal drugs. Not a single time. (All of my EDM friends, just cannot figure that out.) I very rarely drink (I am just designed for that - kind of like the Nazirites. My drug is the God of the Bible, and if you spend a lot of time with him and other Christ followers you get filled with oxytocin. Your capacity for love greatly increases. But this makes us male christians particularly susceptible to sex issues. Its as if we have the capacity to like girls too much. This is why Apple's and Hewlett-Packard's, who appeared to be above board companies, tricked me, when they sold me their products and unleashed their pornographers into my life. They set me up to be ensnared as the result of their malicious business model, and it worked, and now here we are in Federal Court, and I will not rest until Eric Holder decides he wants to start doing his job and this Honorable Court brings these drug dealing Defendants to total accountability under strict liability. I am not alone in this fight. Organizations like Porn Harms, Fight the New Drug, and all of the local churches in America are going to take down these scoff laws.

122. The idea that politicians can save us is ridiculous. Only the Jesus Christ can. The church in America is going to become super active. After 2,000 since the Crucifixion the local church will become more mobile than ever. This progressive cultural shift away from the truth just doesn't work and is making society miserable.

WHEN THE DEFENDANTS SOLD ME THEIR PRODUCTS THEY WERE AWARE OF
THE FOURTH "A" - AGGRESSIVE





123. The final “A is *Aggressive*. As an expression of their disdain and disgust for pornography, I have heard people declare, “I would never look at that filth! Here’s the news flash: “IT’S LOOKING FOR YOU! What many still don’t understand is that pornographers are predators—they are *aggressively* pursuing each one of us and Apple and Hewlett-Packard have an agency relationship with them! At a trial on the merits, I will walk through the dastardly techniques the Apple's and Hewlett-Packard's pornographers use to expose the innocent and unsuspecting to their material through experts. Apple and Hewlett-Packard have designed their products so that pornographers will stop at nothing—even pushing, stretching and sidestepping the law—to expose as many as possible to their wares. Like the street dealer peddling dope behind the grade school playground, these drug pushers are shameless. Make no mistake about it, the fourth “A is Aggressive to the max! Apple and Hewlett-Packard are the kingpins of this criminal enterprise. As the British Prime Minister stated in November 2013, paraphrasing, "at first we believed that nothing could be done about this hopeless problem, but as soon as I began taking action, we realized that something can be done, and I will not stop until this dark world is stamped out."

124. Apple and Hewlett-Packard had carefully considered the four A's: Accessible,

Affordable, Anonymous and Aggressive - before they sold me the products. Their knowledge of the 4 A's was factored into the design before it left the plant. They opened the door and unleashed their pornographers to cause me to become addicted to their products (reducing themselves to administrators of vultures making me the prey). Apply this 4 A template to any other addictive substance on earth—instant access and unlimited supply, little or no cost, totally secret, and a supplier who is always nearby, aggressively pursuing his existing and potential clients—and you tell me what would happen to addiction rates? What can possibly compete with the Four A's and this *super-drug*? It is understandable that the overwhelming numbers of Americans are getting caught up in the pornography trap set by Apple, Hewlett-Packard, and their coconspirators. Meanwhile, the executive branch appears to be in on this scam. Eric Holder refused to meet with federal prosecutors like Patrick Trueman, who present to him hundreds of signatures on petitions demanding that he enforce child obscenity laws because he is a disgrace. He thinks he is above the law, and it is as if there is an under current of undermining the rule of law that President Obama and Eric Holder are facilitating in some areas.

125. At the time I purchased the Apple and Hewlett-Packard products, they made no mention that their joint effort with pornographers would lead to "(1) unwanted exposure, (2) porn addiction, (3) escalation, (4) desensitization, and (5) acting out sexually." They are well aware of these risks for their users but intentionally fail to raise them because doing so would interfere with their plan to get the public dependent on their products.

126. SUM OF THE PARTS:



Without the capacity to connect to the internet. There is no internet. The internet is the sum of a part. The sum is the Apple and Hewlett-Packard product that amounts to a box of porn with a few other pieces of content. This is so obvious at this point it is nearly scary that Apple and Hewlett-Packard would amount any defense whatsoever. When a person "gets off to porn," they are doing so while looking at Apple and Hewlett-Packards screen, listening to the exotic sounds on Apple and Hewlett-Packard's speakers, not the "internets screen and sound system." Without the device there is no internet. The internet is a sum of a part that is the Apple and Hewlett-Packard device. Apple and Hewlett-Packard are brinks an mortar distribution center. They must be held accountable to what they are distributing to their customers, not so intangible theory nicknamed the "internet." This is American, not some state of Nature. These device makers must be held accountable for working with pornographers to expose their adult clients and minors to pornography. If Eric Holder will not do his job, he must be fired by the Inspector General. If President Obama does not start defending traditional marriages, he should be impeached by the House and Senate.

127. SUPERSEDING CAUSE: Without the Apple and Hewlett-Packard product, there is no

access to the addicting pornography. Without the screen, with the key pad, without the electronic wiring in the Apple and Hewlett-Packard product, there is no viral smut to poison and pollute the mind and soul of the Apple and Hewlett-Packard customers. Apple and Hewlett-Packard refuse to sell their customers filters because they are working with porn predators to turn their customers into slaves of their products. Chemical dependence is the goal, which is accomplish their deliberate defective design.



128. **EASY FIX**: The Defendants could easily fix this defect that is harmed the Plaintiff but they desire to take advantage of the fact that pornographic predators would suck him into their dark world so that he would become bonded with their products which is the primary distribution mechanism of the addicting pornographic content that Apple and Hewlett-Packard are supplying.

129. The Plaintiff does not contend that Apple and Hewlett-Packard could merely improve the product. The Plaintiff contends that they intentionally and maliciously sold their product in defective way to cause the Plaintiff to become addicted and dependent on their product, intentionally subjecting him to predatory pornographers, who the Defendants have a business relationship with. The Defendants acted in league with pornographic predators incentivizing,

ratifying, and encouraging their activity - inviting them to suck their customers into the dark-addicting-vortex of pornography, who the Defendants have fooled into believing that their products were family friendly, through false marketing campaigns. The Defendants want their customers to be chemically dependent on their products. They know the potency of their drug, computer porn, that they are distributing throughout the world.

130. **HEWLETT-PACKARD AND APPLE WANT US ADDICTED TO THEIR PORN AND DEPENDENT ON THEIR PRODUCTS SO THAT THEY CAN TURN US INTO**

WALKING BILLBOARDS TO COMPEL OTHERS TO BUY THEIR PRODUCTS: The Defendants want customers, like myself, to carry their products with them were ever they go and rely on them as an an emotional crutch. The Defendants provide the false illusion that their products will make the customer not feel alone, leaving them lonelier than ever. The Defendants know that their best advertiser is their customer in public with their product. The Defendants intent to turn us into walking Billboards, by commissioning pornographers to get us hooked on internet pornography. The computer porn the Defendants distribute is the glue to this malicious marketing plan to keep their clients attached to their products. This is part of their hypocritical and vicious marketing plan that is grounded in fraud and serves to make their products defect. Meanwhile, no one is holding them accountable because Apple and Hewlett-Packard are hiding behind the idea that porn is not something to talk about in public, and Eric Holder is on a mission to undermine the rule of law in the area of sex.



131. **AUTOMATIC WIFI, CREATED FOR ONLINE EXPLORATION, INVITING**

PREDATORY PORNOGRAPHERS: When the Plaintiff bought his Apple and Hewlett-

Packard computer, wifi airport was already set to automatically connect with any internet provider. Anytime that the Plaintiff walked into a hot zone, volumes of online pornography and the thousands of pornography predators that Apple and Hewlett-Packard are in concert with were only a few clicks of the mouse away from inflicting decimating results. By simply walking into a hot zone the predatory pornographers could begin their vicious onslaught to reel in the Plaintiff, thanks to the cookies they deposited on the Plaintiff's computer.





132. **FAILED TO OPERATE AS EXPECTED ELEMENT**: Apple and Hewlett Packard's products failed to operate as expected. The Plaintiff did not expect that he could be tricked into encountering such highly addictive computer pornography, through a deliberate design flaw and partnership with pornography and false marketing campaigns. The Plaintiff did not know that these Defendants, who held themselves out as being law-abiding, would leave him vulnerable to predatory pornographers, who they are capitalizing on. The Plaintiff did not know that the computer pornography the Defendants subjected him to was so addicting. The Plaintiff did not expect to form an unnatural connection with the product. The Plaintiff did not expect that in

using the product as it was currently designed, he would be exposed to the disease of addiction.

The Defendant did not expect that the products would constitute a threat to him and his family.

The Plaintiff did not expect the Defendants had an agency relationship with pornographers. The

Plaintiff did not know how addicting this pornographic content would make him bond to his

Apple and Hewlett-Packard product. The Plaintiff did not expect that the amount of porn would

be available on his Apple and Hewlett-Packard products.

133. The Defendants campion pornography because 12% of all websites on the web are pornographic. The more addicting content available, the more money they make.

134. When the Plaintiff purchased the product, his intent was to use the product for business and work purposes. Such purposes were discussed with the Apple and Hewlett-Packard sales person.

There was no mention about the Defendants alliance with predatory pornographers.

135. The Plaintiff did not expect that the pornography that the Apple and Hewlett-Packard product distributed to him and sucked him into by their intentional failures would cause him to lose the inability to experience intimacy, to leave him desensitized, and shattered in all respects.





136. **CASHING IN AND RATIFYING FRAUD BY NON-RESPONSIVENESS TO**

KNOWN DANGER: Apple and Hewlett-Packard are cashing in on the fact that many adult sites misrepresent their content or the nature of their sites by registering domain names that are intentionally confusing, using page coding design to mislead search engines, distributing false advertising to promote sties traffic, or hijack visitors of another site. The Defendants knew this was occurring but did not warn the Plaintiff or modify their device to protect him from their agents attempts to inflict him with addiction.





137. By selling their products in the defective manner provided to the Plaintiff, Apple and Hewlett-Packard are questionably behind the pornographers schemes that cause their clients to develop codependency on their products. These schemes are the biggest source of unintended exposure to sexually-explicit images and content for internet users of all ages. But the problem is particularly compelling in that children are involved. Yet, what does Eric Holder and the FCC do, nothing.

138. **ESTABLISHING THAT THE DEFENDANTS' PRODUCTS WERE DEFECTIVE**

UNDER TENN. CODE ANN. § 29-28-102(2): Apple and Hewlett-Packard sold me a defective product under TENN. CODE ANN. § 29-28-102(2), given the conduction they were in when they left the plant and after they left the retail store in light of the totality of these circumstances. TENN. CODE ANN. § 29-28-102(2), states A “defective condition” is “a condition of a product that renders it unsafe for normal or anticipatable handling and consumption.” Given the Defendants' alignment with predatory pornographers and their knowledge about the addicting qualities of the pornography they forced upon me and others, the Defendants' product was

grossly defective and amounted to a bundle of highly-addictive-inescapable-pornography with a some other nonaddicting data. The fact that (1) the Defendants were falsely advertising that their products were safe, the fact that (2) the Defendants were aware of how addicting the porn the porn they distribute is, the fact that (3) the Defendants did not warn that the Plaintiff that he would be exposed to this addicting content whether he wanted to be or not, the fact that (4) the Defendants commissioned pornographers to lure him into addiction that made him dependent on their products, the fact that (5) there was a fiduciary relationship based on the Defendants' technical expertise of cutting edge electronics, and the fact that (6) the Defendants products never left their control, given their constant updating of software and continuing communication between their products and the mothership are just a few of the factors that cause their products to be categorically defective for purposes of TENN. CODE ANN. § 29-28-102(2).

139. In fact the Defendants products are defective under similar statutes in all 50 states. Additionally, the Defendants products are so defective that they are violating child obscenity laws in all 50 states and provoke necessary prosecution of Apple and Hewlett-Packard executives. The fact that the FCC and Eric Holder are not doing anything about this problem does not mean that Apple and Hewlett-Packard are not in violation of the law. Eric Holder should be fired by the Inspector General, and if the Inspector General will not fire him, the Inspector General should be fired. But minors aside, the pornography tactics of Apple and Hewlett-Packard is not just harmful to minors, it is harmful to males and females of all ages, to include the Plaintiff.

140. In this case, the Apple and Hewlett-Packard software worked as expected initially, but I did not expect that the Apple and Hewlett-Packard would place me in a position to be hunted down by their pornographers, who would suck me into their dark world of smut using the same tactics that street drug hustlers use, which causes them to be incarcerated in federal and state penitentiaries.

141. **CLARIFYING AND DISPELLING SOME OF THE DEFENDANTS' CONCERNS LODGED IN THEIR RIDICULOUS RESPONSES**: In bring this action, the Plaintiff is not merely putting forward measures that the Defendants could have taken to protect him from harm by selling their products with preset filters or updating software that made reasonable attempts to block pornography. Instead, the Plaintiff contends that the Defendants knowingly, intentionally, maliciously, and deliberately sold their products in a defective manner so that the Plaintiff would become addicted to pornography and form a sexual bond with their product. The Defendants plotted to become not only the delivery mechanism of the potent drug of pornography but an essential part of the drug itself. Like in the movie Don Jon, which came out after this lawsuit, the sound of starting the computer was the triggering point for the addiction, not the sound of logging onto the internet. The internet is codependent on the Defendants' computers. The Defendants deliberately knowingly, reckless, intentionally, and foreseeably invited pornographic predators to hunt down, entice, and overwhelm the Plaintiff's defenses with images and videos of graphic sex through unwanted forced encounters with their addicting substances.

142. APPLE AND HEWLETT-PACKARD ARE USING THE STANDARD SEX-

**TRAFFICKING DRUGGING TECHNIQUE WHICH SHOULD PROVOKE FEDERAL
CONGRESS TO PROMULGATE CRIMINAL LEGISLATION TO STOP THIS**

PRACTICE:

There is no question that pornography is linked to sex trafficking. Apple and Hewlett-Packard products are sold in a condition that is ramping up the demand side of sex trafficking and child pornography. Apple and Hewlett-Packard are linked to sex trafficking in a different way. Many times in places like Greece, Sex traffickers chain their victims to beds and drug them against their will so that they will be compliant with their evil design. This is effectively what Apple and Hewlett-Packard are doing in this situation, given their flawed designed. The Defendants are drugging their customers against their will by selling their products in a fashion that inevitably exposes them to the largest supply of highly addictive pornography the world has ever seen. The Defendants are working hand in hand with pornographers to enslave their users and make them hooked to their products and a slave to their will. It is sick. It warrants total liability and criminal prosecution. Apple and Hewlett-Packard must pay out to the victims and to all of the caring human beings who are working to help the victims recover. Apple and Hewlett-Packard are at the top of the sex trafficking pyramid. The sex trafficking enterprise is a threat to National Security, whether the President or Eric Holder want to believe that or not. The President and Eric Holder are not on the side of the truth because their hearts are blind. In comparing the sex trafficking industry to Al Qaeda, Apple and Hewlett-Packard are the Osama Bin Ladin. They are the head of the snake, asking us to take a bite out of their poison Apple that yields death. The President will not go after this version of Osama because to do so would undermine his efforts to advance same sex marriage.



143. Apple and Hewlett-Packard sell their devices in such a defective manner that they are intentionally setting the stage to place men of all ages in a position of irresistible temptation through dishonest forms of enticement. The Defendants authorize and ratify their

coconspirators efforts in placing their collective greed over the well being of the Defendant's customers through lust.

144. **APPLE AND HEWLETT-PACKARD PRODUCTS AMOUNT TO**
MECHANICAL BLOW UP DOLLS:

Hewlett-Packard and Apple were well aware that a persons of all ages, who have sex an inanimate object to the point of orgasms will become bonded to that object. (See the studies on Apple and Hewlett-Packard products of guys preferring blow up dolls to real women)(watch this documentary on Guys and Dolls: <http://www.youtube.com/watch?v=pxCkULUnVH0>).





145. Accessible on Apple's and Hewlett-Packard's products are volumes of evidence on the science of sex to include studies of men who have become sexually bonded with a blow up doll

to the point that they prefer the blow up doll to a real woman. There are several documentaries on that subject. Apple and Hewlett-Packard intentionally sell their products in a fashion to make their products amount to a blow up doll. This is why there are movies like "Don Jon" and "Her" are being released, and why there are millions of posts on Facebook about people deciding to divorce their iPhone 5 in 2014. People are trying to get their lives back after being lied to by Apple and Hewlett-Packard. They are sick of being victimized by their fraud and defective products. The writing is on the wall, the public wants to be rescued, and our government is not the savior.(Neither are the Courts - the Church has the answer). Nevertheless, the FCC and DoD should be responsive. The Defendants have always been in the position to not distribute porn to their customers, but they have deliberately ignored the law to maximize profits because they are greedy drug dealers. Their mess has led to the creation of hundred of anti-sex trafficking groups. The local churches in America are beginning to mobilize like never before, and their voice is going to become louder and louder as more studies show that the Bible was right all along.





146. Class action lawsuits and RICO prosecutions are in store for Apple and Hewlett-Packard. Apple and Hewlett-Packard executives amount to sophisticated criminals. Instead of addressing a symptom of a problem by their efforts to reframe the issue as blaming this non-existent entity they refer to as the internet, it is the very real decision makers at Apple and Hewlett-Packard who must be brought to account for infecting our society with this disease, when they have always had the capability to prevent it.

147. Meg Whitman, from Hewlett-Packard, and Timothy D. Cook, from Apple, are so greedy that their have decisively calculated and plotted to sell defective products in an addictive

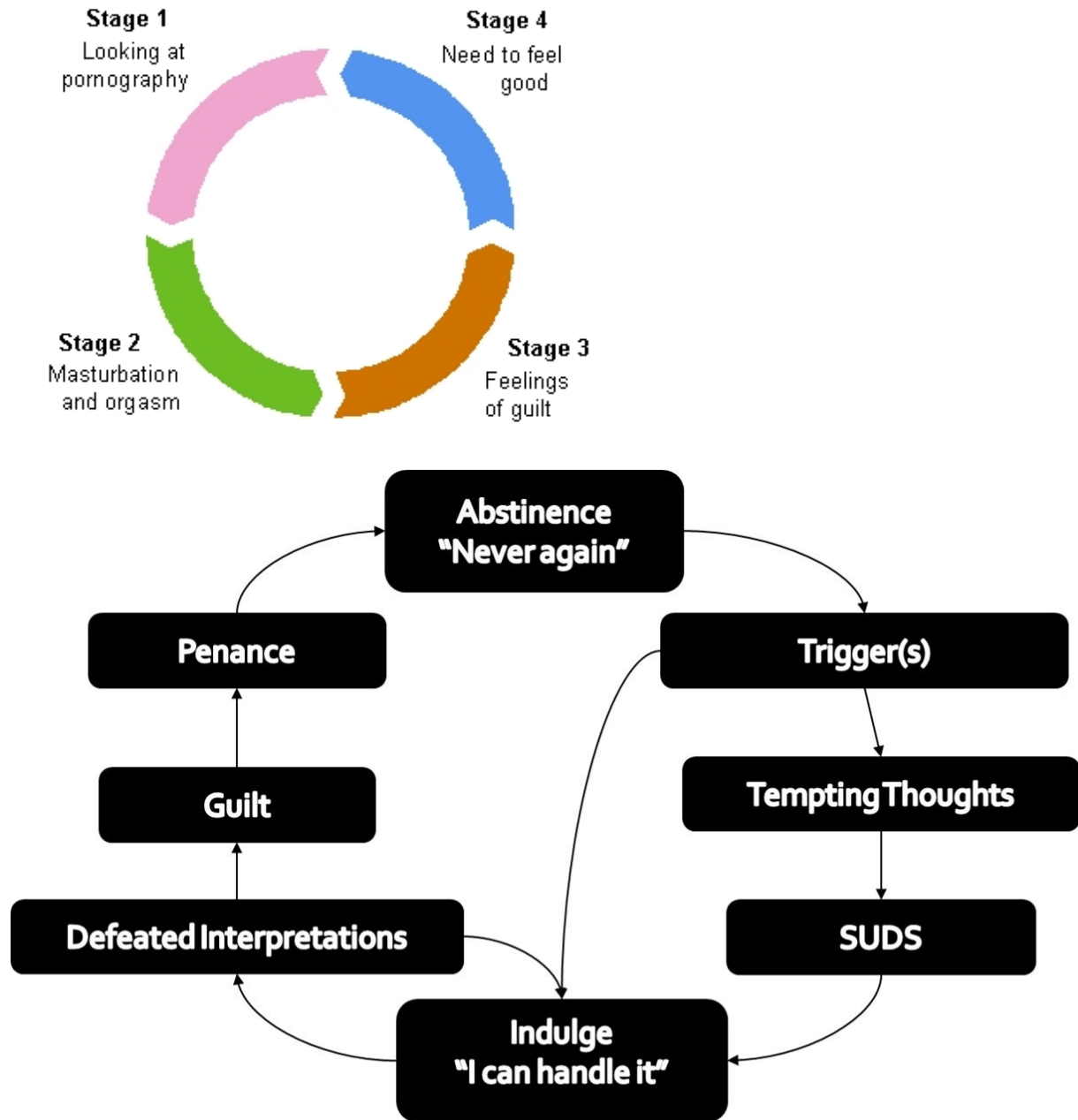
fashion by exploiting the most basic need of humans, the need to feel love and not alone. They intend to provide products that make people not feel alone and gratified, which leaves them more alone than ever and void of authentic relationships. The Apple Christmas commercial goes out of its way to highlight this point and confirm that fraud that these companies are engaging in.

Because Meg Whitman and Tim Cook did not found Apple and Hewlett-Packard, I am praying that they will start becoming part of the solution, not part of the problem. Their devices are being sold in a condition that is tearing people's lives apart across the globe.





148. There are five love languages, one of those is physical touch. The Plaintiff's love language is physical touch. (thank you). The ruthless pornography marketers that Apple and Hewlett-Packard exposed him to viciously exploited this human quality vested in the predisposition of the Plaintiff and hundreds of million of other men. Apple and Hewlett-Packard were aware of the porn addiction cycle, and created a defective device to take advantage of it.



149. **THE DEFENDANTS FAILURE TO TAKE RESPONSIBILITY TO COVER UP AND CONTINUE THEIR LUCRATIVE PARTNERSHIP WITH PORNOGRAPHIC PREDATORS:** The Defendants not only fail to take any responsibility for this outrageous exploitation, fraud, and rotten results that are the products of their systemic greed, they literally

mock the Plaintiff and the rest of their costumers by not doing anything to protect them from their vicious pornographers whose backs they profit off of. There is no question that Apple and Hewlett-Packard are in league with these pornographic predators. They depend on them. This is why Apple and Hewlett-Packard go to such ridiculous lengths to market themselves as pro-family companies to create the appearance off arms length separation, only to then turn around and ring the dinner bell for predatory pornographers who have no since of virtue whatsoever. To Apple and Hewlett-Packard I state: *John 8:44: "You belong to your father, the devil, and you want to carry out your father's desires. He was a murderer from the beginning, not holding to the truth, for there is no truth in him. When he lies, he speaks his native language, for he is a liar and the father of lies."* History, has taught us that the devil is in the li. The Defendants false pro-family image combined with their refusal to comply with my demand is evidence alone that they are in bed with pornographers for their own benefit. Let us not forget that the way the CIA tracked down Bin Laden was the result of senior Al Qaeda members denying that Al-Kuwaiti was important. It was their strong denial that the CIA realized that he was extremely important. This lead to President Obama unleashing Seal Team Six shoot Osama in his bedroom. Its called God is a God of Justice. I am calling upon the executive branch to do something against their Anti-American device makers.



Al-Kuwaiti, bin Laden's personal courier



150. Apple and Hewlett-Packard know that the manner in which they sell their products is directly causing the demand of sex-trafficking to rise. It is as if they want more children to be used to satiate the child pornography demand that they are causing to inflame in the reckless pursuit of greed. The FCC and Eric Holders are aware of all of this facts, but they do not care. They would rather ignore the problem or cause local law enforcement to arrest males, who are really victims of Apple and Hewlett-Packards concerted effort with predatory

pornographers. America must stop focusing on putting people in prison, which only makes people come out worse. (Many Republicans should be condemned for being tough on crime because it is politically expedient). We need to attack the roots of a problem. The Churches in America also must do more to assist the state in their mission.



151. **THE DEFENDANTS SHOULD BE REQUIRED TO CHANGE THEIR NAME TO**

THE "MINISTER OF LIES" AND "COMMISSIONERS OF VULTURES": By their

defensive reaction in this lawsuit and refusal to even consider selling their products on safe mode, Apple and Hewlett-Packard are effectively the ministers of the lie that pornography is harmless speech and that they are not distributing pornography to minors. It appears that their rationale is that the more that they violate the law in the open the less the general public will realize that they are breaking the law because they have "reputable brand names." It is if America has become addicted to their products and want to be in denial. Here are some of the lies that these defendants are conditioning the public to accept as true, which is leaving people in bondage.

- Lie #1 - *Women are less than human*
The women in *Playboy* magazine are called "bunnies," making them cute little animals or "playmates," making them a toy. *Penthouse* magazine calls them "pets." Porn often refers to women as animals, playthings, or body parts. Some pornography shows only the body or the genitals and doesn't show the face at all. The idea that women are real human beings with thoughts and emotions is played down.
- Lie #2 - *Women are a "sport"*
Porn views sex as a game and in a game, you have to "win," "conquer," or "score." Men who buy into this view like to talk about "scoring" with women. They start judging their manhood by how many "conquests" they can make. Each woman I "score" with is another trophy on my shelf, another "notch" in my belt to validate my masculinity.
- Lie #3 - *Women are property*
We've all seen the pictures of the slick car with the sexy girl draped over it. The unspoken message, "Buy one, and you get them both." Hard-core porn carries this even further. It displays women like merchandise in a catalog, exposing them as openly as possible for the customer to look at. It's not surprising that many young men think that if they have spent some money taking a girl out, they have a right to have sex with her. Porn tells us that women can be bought.
- Lie #4 - *A woman's value depends on the attractiveness of her body*
Less attractive women are ridiculed in porn. They are called dogs, whales, pigs or worse, simply because they don't fit into porn's criteria of the "perfect" woman. Porn doesn't care

about a woman's mind or personality, only her body.

- Lie #5 - *Women like rape*
"When she says no, she means yes" is a typical porn scenario. Women are shown being raped, fighting and kicking at first, and then starting to like it. Porn teaches men to enjoying hurting and abusing women for entertainment.
- Lie #6 - *Women should be degraded*
Porn is often full of hate speech against women. Women are shown being tortured and humiliated in hundreds of sick ways and begging for more. Does this kind of treatment show any respect for women? Any love? Or is it hatred and contempt that porn is promoting toward women?
- Lie #7 - *Little kids should have sex*
One of the biggest sellers in pornography is imitation "child" porn. The women are "made-up" to look like little girls by wearing pony tails, little girl shoes, holding a teddy bear. The message of the pictures and cartoons is that adults having sex with kids is normal. This sets the porn user up to see children in a sexual way.
- Lie #8 - *Illegal sex is fun*
Porn often has illegal or dangerous elements thrown in to make sex more "interesting." It suggests that you can't enjoy sex if it isn't weird, illegal or dangerous.
- Lie #9 - *Prostitution is glamorous*
Porn paints an exciting picture of prostitution. In reality, many of the women portrayed in pornographic material are runaway girls trapped in a life of slavery. Many having been sexually abused. Some of them are infected with incurable sexually transmitted diseases that are highly contagious and often die very young. Many take drugs just to cope.

152. Here is what Apple, Hewlett-Packard, and their wicked lawyers are failing to protect by selling their devices in the defective manner that they are currently in. The executive branch is in on this directly as well.



she's somebody's
daughter

CREATING A NEW CULTURE



153. **THE GOSPEL OF LIES: APPLE AND HEWLETT-PACKARD'S PORN**

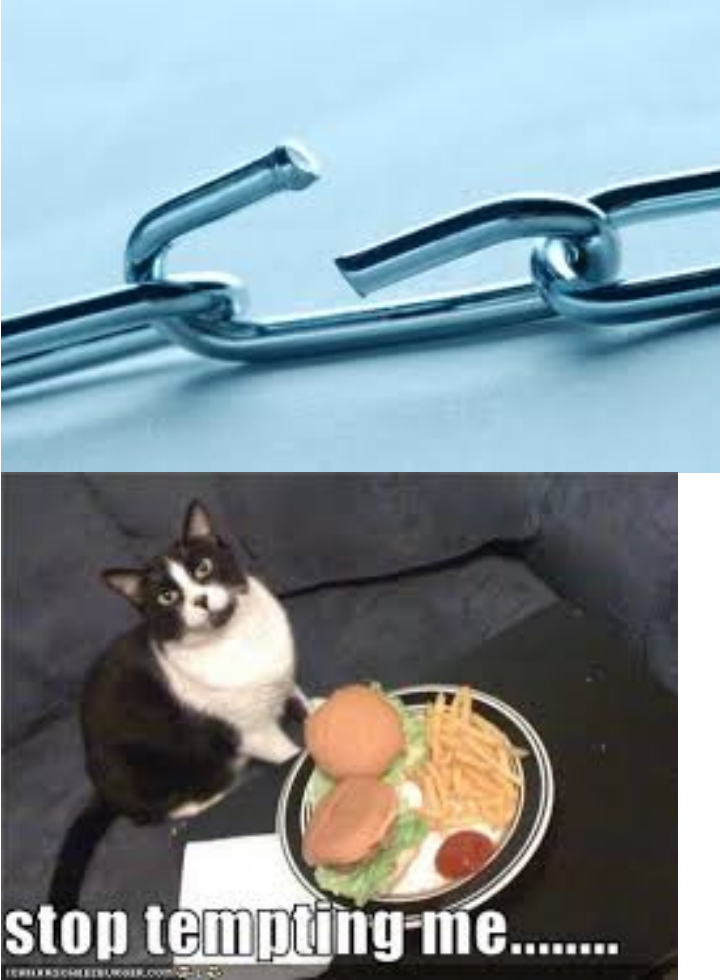
MARKETING PLAN: Because of Apple's and Hewlett-Packard's policies and the non responsiveness of the executive branch and their own part in the great misdirection, here are some other insufferable lies that the Defendants have inflicted on our society: (1) "I'll never get free of sex addiction" (2) "Pornography helps my marriage sex life" (3) "I can't live without my porn" (4) "God made me this way" (5) "God won't accept me because I keep falling to temptation" (6) "All sex is good" (7) "Forbidden sex is more enjoyable" (8) "If it feels right it must be ok" (see child molestation and homosexual conduct) (9) "The Bible teaches that sex is dirty" (10) "Pornography doesn't hurt anyone" (11) "Martial Sex is boring" (12) "Have as many partners as possible before you get married and trapped" (13) "Porn will teach you how to have great sex" (14) "Getting married will stop my pornography addiction" (15) "Strangulation during sex is normal and healthy" (16) "Lust is the same as love" (17) "There is nothing wrong with cultivating and acting upon lust" (18) "Masturbation is harmless and healthy" (19) "God is unfair and unloving to restrict sex to marriage." (20) Abstinence is unhealthy and unrealistic" (21) "Lots of sex with different partners brings satisfaction and fulfillment" (22) "I want regret

putting pornographic images on the web" (23) its cool to make porn - just as it was cool to buy an Ice Tea record after our parents said not to (24) "my past sexual history will not manifest problems in my marriage" (25) "having sex with different people does not impact my ability to bond" (26) there is no such thing as porn addiction (27) there is no such thing as shame addiction (28) "Pre-marital sex is ok as long as you're planning to marry the person" (29) "Sex is Ok as long as you are committed to one another in a monogamous relationship." (30) "Eric Holder is free from checks and balances" (31) "watching porn does not hurt anyone" (32) "God doesn't care about what I do with my body" (33) "I've committed the unforgivable sin" (34) "Your body is not good enough to be sexually successful" (35) "I cannot be loved unless I can compete with him, I think I'll buy viagra that I saw on the late night infomercial" (36) I cannot be loved unless I can compete with the girl in the porn video: I think I'll get lip implants, breast implants, and a nose job" (37) "the actresses in porn are having fun and want to be there" (37) "porn has no connection to prostitution and sex-trafficking that is something that Chris Sevier single handedly invented to promote his band" (38) "Apple is against pornography" (39) "this situation is hopeless" (40) "there is no withdraw from porn" (41) "saying that porn is sex education is not a pathetic attempt to justify accessing this drug by those who are addicted to it."



154. BREACH OF DUTY: The Defendants have a duty to be straight forward with their customers. The Defendants cannot flaunt "freedom from porn" propaganda only to keep their machinery rife with the worlds largest supply of pornography ever imposed upon mankind. This duty was molested in my case. Although pornography was not ever mentioned by either party. Apple's and Hewlett-Packard's agents were working under the mindset of selling me a nonaddicting and family friendly product when they sold me the computers. We focused on how the computer could help my business. Additionally, the Defendants have a duty to not invade the Plaintiff's privacy by opening the flood gates to pornography predators to inject their customers with pornography addictions so that they will become dependent and reliant on the Defendants' product. No, I think not. The Defendants grossly violated that affirmative duty.





155. Apple and Hewlett-Packard have a duty not to sell products that are unreasonably intrusive and invade privacy. They breached that duty by cyber stalking their customers with predatory pornographers.

156. Apple and Hewlett-Packard have a duty not to market themselves as pro-family companies only to provide to expose those families to the ruthless pornographers who suck their customers in and get them addicted to the point that they prefer having sex with their products over a member of the opposite sex.

157. **INSTRUMENTALITY WITH THE DEFENDANTS CONTROL**: The Plaintiff was unquestionably injured by the instrumentality within the Defendants control. The Plaintiff had no idea he would be expect to modify their device to make it safe. This is like a Tobacco executive suggesting that the customer should have to take the responsibility of modifying the cigarette to make it not addictive. Such a contention is absurd. The Defendant should have had their products placed in a position that prevented the Plaintiff from accessing pornography before it left the manufacturer. The Defendants knew that they would be exposing the Plaintiff to dangerous and addicting content, given the volume of porn available on their products and the aggressiveness of predatory pornography who are as concerned with profit maximization as the Defendants. Despite the peril they placed the Plaintiff in, they set out through their agents to inflict him with addiction for their personal profit. The Defendants are well aware of the dangerous, harmful, and addicting nature of pornography that they expose their customers to. They have formed a covert partnership and alliance with predatory pornographers (which they have made abundantly clear in how they have reacted to this lawsuit). Towle v. Phillips, 172 S.W.2d 806, 808 (Tenn. 1943)

158. **COUNTERFEIT REFUGE**: The Defendants are aware that their customers are human and long to seek refuge from pain. They are aware that the their customers are sexual beings endowed by our Creator with sexual parts and the brain chemistry to be attracted by members of the opposite sex. They know that the brain cannot readily distinguish between computerize images of porn and nudity in person. The Defendants are well aware that it is a crime for them to distribute pornographic content to minors in all 50 states in the United States.

The Defendants are well aware that their customers have a right to be free from addiction unwanted addictions that they did not have choice in. The Defendants know of the dangers and perils of pornography that seeks out their customers but does not care about this or any other of its duties because the Defendants hope that their clients will be sucked into pornography so that they will become addicted to their products. The Defendants designed their products so that their customers would develop pornography addictions. The Defendants formed agency relationships and profit scheme with predatory pornographers. The Defendants made huge contributions to the Obama campaign so that Eric Holder would not respond to the British Prime Ministers request to form a joint task force to tackle this cancerous problem.

159. **EXCLUSIVE CONTROL & AMBUSH ELEMENTS RAISED BY THE DEFENDANTS:** The Defendants' products that injured the Plaintiff and millions of other Americans was in their "exclusive control," when the injury took place, leading up to the injury, and continued afterwards. The Defendants knowingly shipped the product to the retailer in a manner that left the Plaintiff and the rest of their customers at the mercies of the pornographic predators they commissioned. In shipping the product to the retailer from the plant, the Defendants set into motion a sequence of events that lead to the Plaintiff's injury. The Plaintiff was not in the position to know whether or not the Defendants' products could inflict him with addiction. The Defendants were in the position to know that not only could their product likely create addiction that it was specifically part of their malicious intent to create codependency. The Defendants lulled Plaintiff into believing that the device was professionally made for business purposes, not addiction purposes. The Defendants marketed themselves as law abiding and

family friendly manufacturers of cutting technology that would revolutionize ones life for the better, asking him to "think differently." The Defendants effectively lulled the Plaintiff into letting his guard down, only to unsuspectingly turn around and unleash their predatory pornographers into his life. The Defendants relied on the fact that the Plaintiff would feel too ashamed to hold them accountable trusting that he was as prideful and greedy as they are. Although the Defendants product were in their exclusive control for purposes of products liability, they are now with in the exclusive control of the Plaintiff through this Court, since the Plaintiff is the master of his complaint. Now that the Defendants stand accuse in this civil action, the Defendants are finger pointing at the internet and making other outrageous excuses - refusing to comply with the obscenity laws. In the end, the Defendants only care about maximizing profits. They are the worlds greatest con-artists.





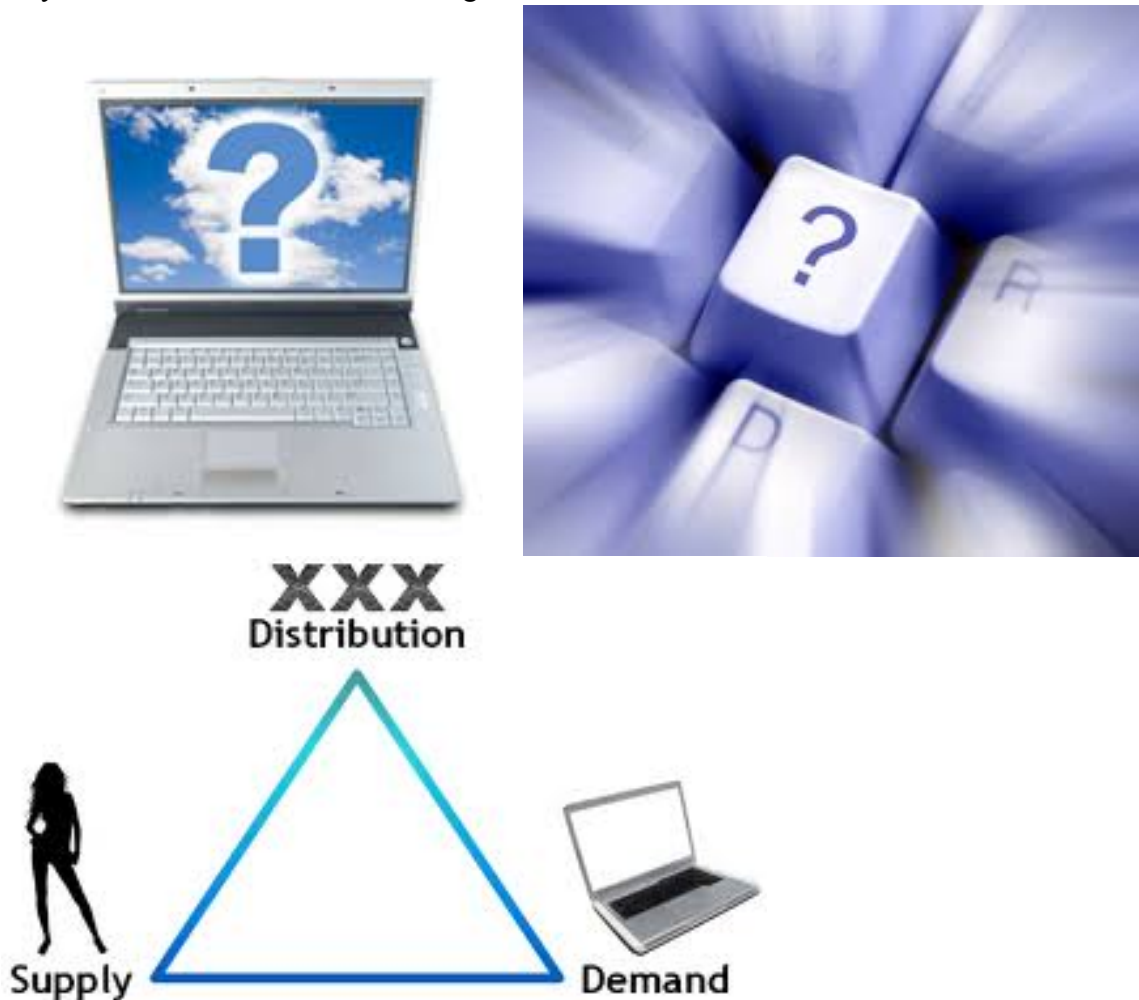
160. **LATENT DEFECT**: When the Plaintiff purchased the Defendants product he was clearly under the impression that Apple and Hewlett-Packard had his best interest in mind not theirs; he was tricked into believing that Apple and Hewlett-Packard would not expose him to addiction. The Plaintiff was induced, enticed, and lulled to sleep by Apple's and Hewlett-Packard's presentation of professionalism and posturing of healthy progress through the must cutting edge technological advances. Apple and Hewlett-Packard's products were sold in a manner that constituted a latent defect. They were intentionally sold without any kind of filtering software to protect the Plaintiff from coming in contact with addicting pornography. Apple and Hewlett-Packard deliberately failed to provide any warnings that this could occur. Because the Plaintiff did not have any warnings or knowledge of the defective product, Apple and Hewlett-Packard were in exclusive control and exclusively awareness of the dangerousness of their defective product. The Plaintiff was under the false impression that the Defendants were not in bed with predatory pornographers because that was the message they hoped he would believe.

161. **TAX PAYER STANDING, UNIQUE PERSONAL INJURY, INCREASED FUNDING FOR SEX TRAFFICKING AND CHILD PORN CRIMES:** As a tax payer, the Plaintiff suffered an injury directly from the defective product that Apple and Hewlett-Packard sold him under the major fraud campaign in their quest to profiteering on the backs of aggressive pornographers. Not all tax payers are customers of the Defendants. Not all customers who purchase Apple and Hewlett-Packard's filterless products react the same way when exposed they are tricked into accessing pornography. An 88 year old grandma might have a different reaction than a young male, who is loaded with testosterone and substance free. Apple and Hewlett-Packard, of course, pray that all of their customers will become bonded to their products over anything else in the universe because they are hopeless greedy and without a shred of care for their clients that they deceive. Yet, Apple and Hewlett Packard are well aware of the studies put forth by the Witherspoon Institute, Morality in Media, Porn Harms, She's Somebody's Daughter, and the hundreds of organizations listed here: http://en.wikipedia.org/wiki/List_of_organizations_opposing_human_trafficking that demonstrate that online pornography, they are primarily responsible for making available and distributing, is making the demand side of child porn and sex trafficking sky rocket. Apple and Hewlett-Packard know that their fraud and non-compliance with the law makes them the head of a the sex trafficking enterprise.



162. Apple and Hewlett-Packard are unquestionably aware that their failure to sell their products in a way that make pornography harder to access before their products leave the manufacturer and are in their exclusive control that they are chiefly responsible to the proliferation of organized sex crimes. This not just something that the Plaintiff feels or wishes, as

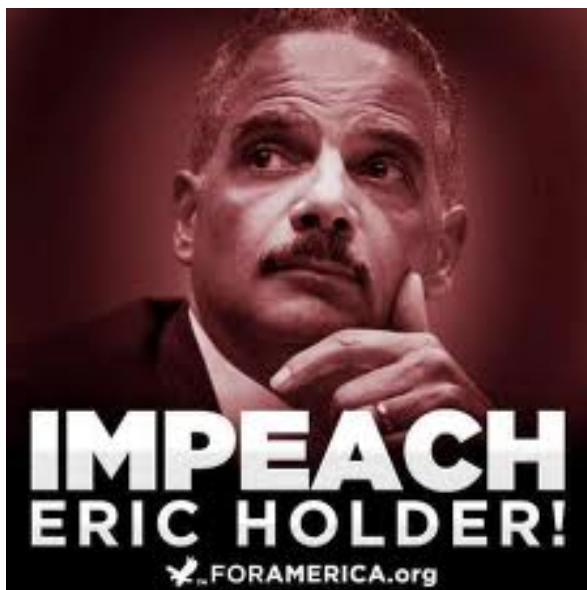
the Defendants have asserted in response to this action. The knowledge of this reality is within the firm grasp of the executives at Apple and Hewlett-Packard, who can access the information on their on products. Yet, Apple and Hewlett-Packard could careless that their products are producing insurmountable problems for law enforcement as pro-child molesting attorneys, like Professor Sara Ford, make hyper-technical arguments on behalf of Apple and Hewlett-Packard only because she is as dishonest and greed as her clients.





163. **KNOWLEDGE AT THEIR FINGER TIPS**: The reality is that Apple and Hewlett-Packard can use their own products to access volumes of information that unquestionably demonstrate that the lack of accountability to make it harder to access pornography that their products distribution function is the chief cause of the explosion of sex trafficking across the globe. This places them in a unique position to be completely without excuse. Apple and Hewlett-Packard are so self-deceived by their insatiable greed, they would literally commission their equally greedy attorneys to argue that this correlation between sex crime and their failure to sell their products on safe mode is something that I alone invented because I must think this is all some grand joke. (The Defendants were even foolish enough to suggest that I filed this lawsuit to promote my EDM band because they think that every one is as greedy as them, but what they will find is that I am the one who "thinks differently"). The Defendants are so void of character that miscalculations are going to be a way of life for them in this lawsuit. Apple and Hewlett-Packards executives need to be prosecuted by the U.S. attorney's office, the state district attorney office, and the attorney general's offices for their outrageous failures in placing their intrusive greedy aspiration over the well-being of the people who were victimized because they opened up our world to the horrors of pornography by

distributing it, finger pointing elsewhere, and hiding behind out dated technicalities that fail to factor in the realities that "porn online is looking for us, not the other way around." There is no question that Apple and Hewlett-Packard want it that way because they want their customers, like me to be addicted to not just porn, but to their device that makes the addicting content available. The Defendants are well aware that one cannot exist without the other. Eric Holder and the FCC are clearly aware of this reality but they would rather either ignore the problem or engage in a form of misdirection themselves by focusing on the symptoms, not the source of the problem. God will not allow corruption like this in America to go on forever. He will bring forth Judgment on our Nation for turning our back on Him. Those are not my words. Those are the not just the words of the Bible. This is what the historical record has demonstrated since the inception of mankind. That story does not just stop because Apple and Hewlett-Packard release a new product and assert that things are going to be different. The principles of the Bible are woven into the fabric of the Universe and are unchangeable in the same way that the law of gravity is.





164. **TAX PAYER DISTINCTION:** the Plaintiff is distinct from all other tax payers in the state of Tennessee because he served in the military overseas during a time of war.





165. The Plaintiff pays taxes to the state and Federal government who then must allocate additional funds to combat the growing sex trafficking and prostitution problem that Apple and Hewlett-Packard have created by failing to sell their products on safe mode. He is harmed in this regard, as well as numerous others. U.S. Code: Title 38 places combat veterans in a special category because unlike Apple, Hewlett-Packard, Eric Holder, and President Obama, we actually went to war to fight for the very laws that they hold in contempt.

166. Apple and Hewlett-Packard can redress the injury inflicted on the Plaintiff as a tax payer if they will modify their products so that the customers are not sucked into porn addiction by their predatory pornographer coconspirators. If the Defendants will sell their products on "safe mode," with software that is preset before the device leaves the manufacturer

that makes reasonable attempts to block pornography, establish the "list method," and card purchasers who want the filter deactivated, like any other bricks and mortar stores, then Apple and Hewlett-Packard might be in a better position to escape some criminal and civil liability - possibly. If Apple and Hewlett-Packard will sell their products in a fashion that makes it harder to access pornography, then less money paid by the Defendant in taxes will go towards fighting sex trafficking, and therefore, the Plaintiff will not be as injured by the Defendants' nefarious business model.

167. Those who opt in to see pornography are still going to provide the jails with plenty of business. Sex trafficking organizations will still be working over time to clean up the mess. Apple and Hewlett-Packard will still have plenty of people who are addicted to their products under the current regime. But if Apple and Hewlett-Packard will comply our neighborhoods will be safer, you children will be better off, our grandchildren will respect us, our world will be better off.

SECTION II STRENGTHENING THE ELEMENT OF "OUTRAGEOUSNESS FOR THE BENEFIT OF THE DEFENDANTS"

168. EXPOSING LAW ENFORCEMENT TO UNNECESSARY INCREASED RISK BY THEIR VILE SCHEME IS OUTRAGEOUS :

Apple and Hewlett-Packard market themselves as pro-police and pro-law enforcement only to turn around and sell their products in a fashion that is making law enforcements job extremely difficult and more dangerous. Such a betrayal to law enforce alone warrants prosecution by the Department of Defense and state prosecutors. And let me be clear, I personally take great offense

that Apple, Hewlett-Packard, the FCC, and Eric Holder would engage in any kind of activity that exposes law enforcement to unnecessary danger. The idea of that is flagrantly outrageous and worthy of immediate impeachment. This is why the Inspector General's office must hold Eric Holder accountable for dereliction of duty and service discrediting misconduct. This is waste, fraud, mismanagement, and abuse. To put men and women in law enforcement at any more risk causes me to resolve to strictly enforce my rights to the fullest extent under the law.





169. **EMOTIONAL DISTRESS AND OUTRAGEOUS CONDUCT:** The Defendants not only intentionally inflicted the Plaintiff with emotional distress, the Defendants unequivocally committed outrageous conduct. The Defendants are running what amounts to a fraud mill, a distribution empire of pornography, and a grand advertisement for sex trafficking, child porn, sex addiction, stimulation addiction. (These things are so upsetting they are difficult to write about). RICO statutes were promulgated specifically to take down these kinds of criminal enterprises. The Defendants say that it is easy for the customers to take the steps themselves to download software to block porn. Those are their words, not mine. Yet, by the natural inference of their

own omission it would be even easier for them to sell their products with this software pre-set to block pornography, which it can install before the products have left the manufacturing plant (which better ensures their safety), and then set in place system that requires their costumers to have to look an actual person in the eye, when they ask for permission to disable the filters upon showing proof of age. If Apple and Hewlett-Packard can install software like Safari, they can install software to help them live up to their false advertisement of "family friendly products." The Defendants are engaging in outrageous conduct by violating the child obscenity laws in all 50 states by distributing smut to minors. This smut is indiscriminate when it comes to victimizing its users regardless of their age. Apple and Hewlett-Packard are well aware of that but do not want to have to come to terms with the fact that they are in the porn-distribution business because it will tarnish their grand marketing scheme to present themselves as above-board and pro-family. This is the worst kind of fraud. It warrants civil liability and criminal prosecution. Apple and Hewlett-Packard's failure to sell their products on safe mode is responsible for the rise of sex addiction in the elderly for goodness sake. That concept is distress in and of itself. Apple and Hewlett-Packard's distribution scam is the source of all of the late night infomercials on sex drugs. This is because the porn they and their partners have inflicted on society is causing desensitization, arousal addiction, erectile dysfunction, premature ejaculation, sexual anorexia, fear of intimacy, and other problems. As internet pornography continues to expand and grow, so does the problems it is creates expand in the public. If Apple and Hewlett-Packard were forced to sell their products on "safe mode," requiring their customers to take the steps to acquire the pass code to disable their filters, there would be a huge shift back towards innocence in this world. We will all be the beneficiaries if device makers stop worshipping money,

and return to fearing God Almighty, maker of the heavens and the earth.

170. **MORE ON OUTRAGEOUS CONDUCT**: The intentional schemes and scams of the Defendants is outrageous and distressful and should not be tolerated by civilized society because the Defendants are breaking the child obscenity laws in all 50 states. The Defendants are inescapably guilty of distributing porn to minors. Because the Defendants have done such a remarkable job of lying to the public that they are pro-family, while spreading so much addiction that the Defendants feel entitled to act above the law. The Defendants are well aware that a clerk at the 711 must card a customer who seeks to purchase a Hustler Magazine, but because the Defendants are so arrogant, they believe their is no duty to card their customers, knowing full well that they are distributing, not only Hustler magazine pornographic quality content, but the largest volume of traumatizing pornographic ever know in the history of mankind. Their conduct is vile, vicious, outrageous, sanctionable, fraudulent, malicious, callus, cruel, inhuman, dastardly, wicked, deceptive, corrupt, abundant, inexcusable, unacceptable, violent, reckless, intentional, negligent, crafty, and bankrupt-able. The Defendants failure in exposing his to Pornography inflicted serious mental injury to the Plaintiff.

171. **MORE ON OUTRAGEOUS CONDUCT**: Given the volumes of evidence that is the direct possession of Apple and Hewlett-Packard, which is confirmed on their products, which shows that their unfiltered products is causing (1) the demise of guys; (2) increase demand for child pornography; (3) increased demand for sex traffic; (4) increased demand for prostitution; (5) increased sexual addiction; (6) increased depleted capacity to form bonds; (7) increased diminished capacity to experience intimacy; (8) increased number of destroyed

marriages; (9) increased job loss; (10) increased sex crime; (11) increased shift into the sex slave industry by the world's worst cartels; (11) increased number of children from broken homes, there is no way for any person to deny that the Defendants conduct has been anything other than so outrageous in character, so extreme in degree, as to go beyond all bounds of decency, and to be regarded as atrocious and utterly intolerable in a civilized community. The Defendants lawyers and the Defendants executives deserve to be bankrupted and put in jail. They are worst of all sex traffickers because they are at the root of this growing problem. Miller v. Wilbanks, 8 S.W.3d 607, 612 (Tenn. 1999) (citing Bain v. Wells 936 S.W.2d at 623).

172. It is outrageous that Apple and Hewlett-Packard sell their device in such a defective condition that they are breaking the law by distributing porn to minors. In the state of Tennessee, the Defendants are breaking these kinds of laws:

§ 39-17-902

(a) It is unlawful to knowingly produce, send or cause to be sent, or bring or cause to be brought, into this state for sale, distribution, exhibition or display, or in this state to prepare for distribution, publish, print, exhibit, distribute, or offer to distribute, or to possess with intent to distribute or to exhibit or offer to distribute any obscene matter, or to do any of the aforementioned with any matter found legally obscene that violates the requirements of 18 U.S.C. § 2257.

T. C. A. § 39-17-911

§ 39-17-911. Children and minors; harmful materials; sale; loan or exhibition

(a) It is unlawful for any person to knowingly sell or loan for monetary consideration or otherwise exhibit or make available to a minor:
(1) Any picture, photograph, drawing, sculpture, motion picture film, video game, computer software game, or similar visual representation or image of a person or portion of the human

body, that depicts nudity, sexual conduct, excess violence, or sado-masochistic abuse, and that is harmful to minors; or

(2) Any book, pamphlet, magazine, printed matter, however reproduced, or sound recording, which contains any matter enumerated in subdivision (a)(1), or that contains explicit and detailed verbal descriptions or narrative accounts of sexual excitement, sexual conduct, excess violence, or sado-masochistic abuse, and that is harmful to minors.

(b) It is unlawful for any person to knowingly exhibit to a minor for monetary consideration, or to knowingly sell to a minor an admission ticket or pass or otherwise admit a minor to premises whereon there is exhibited a motion picture, show or other presentation which, in whole or in part, depicts nudity, sexual conduct, excess violence, or sado-masochistic abuse, and which is harmful to minors.

(c) A violation of this section is a Class A misdemeanor.

T. C. A. § 39-17-914

§ 39-17-914. Children and minors; harmful materials; display for sale or rental

Currentness

(a) It is unlawful for a person to display for sale or rental a visual depiction, including a videocassette tape or film, video game, computer software game, or a written representation, including a book, magazine or pamphlet, that contains material harmful to minors anywhere minors are lawfully admitted.

(b) The state has the burden of proving that the material is displayed. Material is not considered displayed under this section if:

(1) The material is:

(A) Placed in "binder racks" that cover the lower two thirds ($\frac{2}{3}$) of the material and the viewable one third ($\frac{1}{3}$) is not harmful to minors;

(B) Located at a height of not less than five and one half feet ($5\frac{1}{2}$ ') from the floor; and

(C) Reasonable steps are taken to prevent minors from perusing the material;

(2) The material is sealed, and, if it contains material on its cover that is harmful to minors, it must also be opaquely wrapped;

(3) The material is placed out of sight underneath the counter; or

(4) The material is located so that the material is not open to view by minors and is located in an area restricted to adults;

(5) Unless its cover contains material which is harmful to minors, a video cassette tape or film is not considered displayed if it is in a form that cannot be viewed without electrical or mechanical equipment and the equipment is not being used to produce a visual depiction; or

(6) In a situation if the minor is accompanied by the minor's parent or guardian, unless the area is restricted to adults as provided for in subdivision (b)(4).

(c) A violation of this section is a Class C misdemeanor for each day the person is in violation of this section.

173. **EXCITED UTTERANCE "OUTRAGEOUS!" PLEADING**

REQUIREMENT: Never in the history of man kind has a person from the United States filed a

lawsuit exposing such a rotten systemic problem that is not being addressed by our executive branch that is so out of control that it literally provokes the British Prime Minister to spring into action and begin to demand that the Defendants in America give me the relief I am demanding. That tends to suggest outrageousness one with common sense would think. Those developments are a clear reflection of how outrageous Apple and Hewlett-Packard's conduct extends. This is an international epidemic they have created by their fraud and collaboration with predatory pornographers. In the face of this lawsuit and the demand from the British Prime Minister, Apple and Hewlett-Packard refuse to comply, even though Google has been responsive, which is an omission of guilt on Apple and Hewlett-Packard's part. And yet still, Apple and Hewlett-Packard are so arrogant that they think its business as usual -that is how evil and outrageous and contemptuous these Defendants are. These defendants are so blinded by the significance of their brand, they believe that their distribution of pornography and colossal impact on the demand side of sex trafficking is excusable because Sara Ford thinks it is. Any member of Tennessee, who is aware of these facts, would not be able to exclaim with convincing clarity "Outrageous! Apple and Hewlett-Packard must be held to account!" Or in Latin: "Tanti!" Doe 1 ex rel. Doe v. Roman Catholic Diocese, 154 S.W.3d 22, 39 (Tenn. 2005)

174. **TAKING ADVANCE OF A CUSTOMERS BIOLOGICAL MAKE UP IS**

OUTRAGEOUS: We are all sexual beings. We were biologically created for love, sex, and to produce offspring. This is not something that any of us can turn on or off. Apple and Hewlett-Packard are not merely aware of this, they capitalize on this by designing a dysfunctional product and teaming up with pornography predators in the name of "free speech," when they are not even a state actor. As Martin Luther stated regarding lust, "we cannot keep the birds from

flying over head, but we can prevent them from nesting in our hair." Apple and Hewlett-Packard pray that nests in our hair, and sell a device that ensures it with the help of their pornographic agents. Apple and Hewlett-Packard artificially scheme to make their clients never to feel alone, leaving them more alone than ever before in their life. This is sick, perverted, cruel, pathological, outrageous, malicious, crafty, contemptuous, and vile.

175. Another reason Eric Holder will not touch this matter is it requires the realization that the male brain works differently than the female brain. Men are stimulated by sight. Apple, Hewlett-Packard, pornographers, and Eric Holder know that. But Eric Holder and the other Defendants think that they need to perpetrate a lie on society because they are entirely misguided and blind to objective truth.





176. Unrestricted internet access is a standard feature on computers sold today only because of lobbying and politics. The same content that Apple and Hewlett-Packard make available online is not made available in the analog world. Somehow, Apple and Hewlett-Packard have managed to convince themselves, the media, the public, and the entire executive

branch, that they are above the law, and Eric Holder is culpable in assisting the Defendants into believing this false belief. When it comes to sex laws, Eric Holder is merely an enemy of the law going so far as to destroy it, believing that he is totally immune to prosecution himself, when this is America, and he can be held to account. Accordingly, since Apple and Hewlett-Packard are such cutting-edge-advanced-technological-expert-companies, they think that they are above the law and fall into a special class that is immune from liability in the same way that Professor Ford has convinced herself that she is immune from following the rules of Professional Responsibility in the state of Tennessee - because after all, she is old and has bought into the lie that it is prestigious to represent Apple and Hewlett-Packard, even if it is at the expense of sex trafficking victims around the globe. To which I would respond, "This is no law school exercise Professor. We are talking about sexual holocaust here." It is not as if I went out and started the hundred of anti-sex trafficking groups that are popping up across the globe. That would be the result of her clients, who are doing the devils bidding to destroy mankind.

177. Professor Ford, Eric Holder, Apple executives, Hewlett-Packard executives, and anyone who supports them policies are nothing short of proponents of (1) child molestation; (2) objectification of women; (3) the criminalization of a growing number of johns, who are victims themselves; and (4) sex trafficking. They do not deserve the right to call themselves Americans and should move to North Korea. Apple, Hewlett-Packard, and their attorneys are culpable of massive fraud and crimes against humanity by lying to the public, only to then team up with pornographers to maximize profits. You may mock me and persecute me now, but these things will be accepted as true, by the sexually dissatisfied public that is beginning to see the lies illuminated.

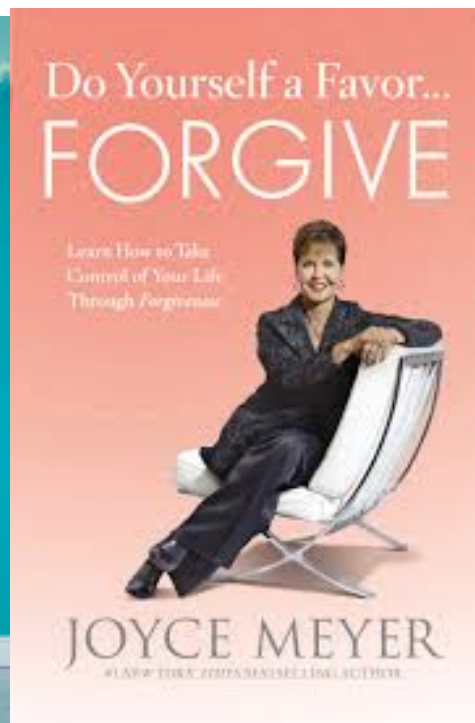
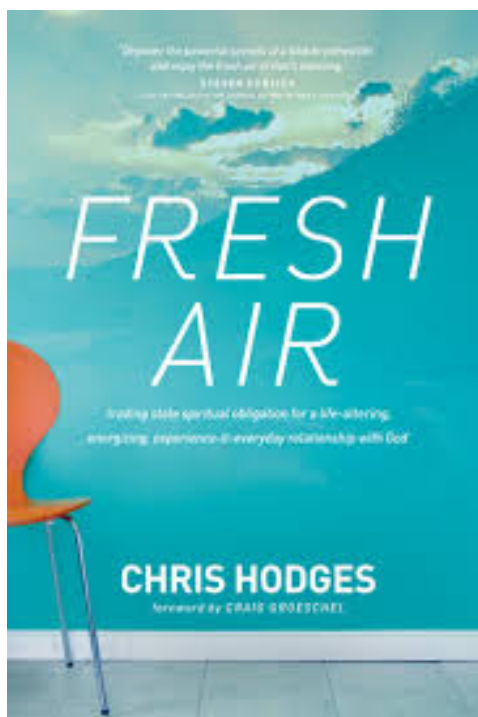
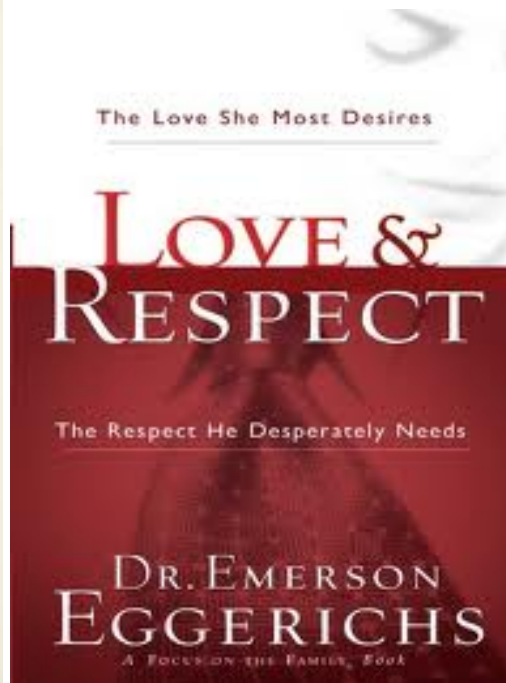
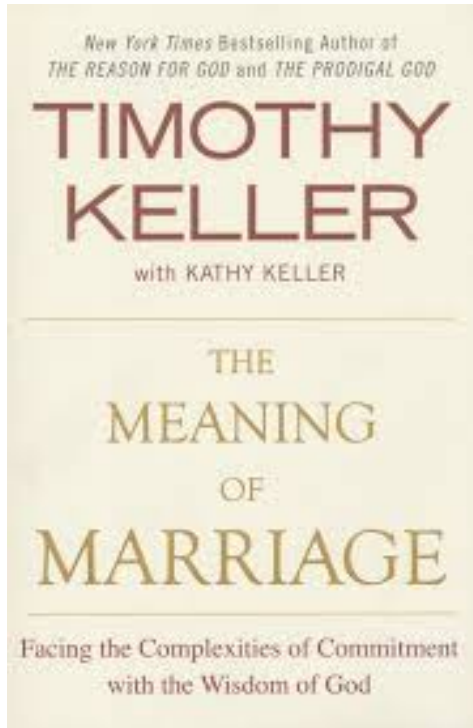
178. **ALIENATION OF AFFECTION IS OUTRAGEOUS CONDUCT ON THE**

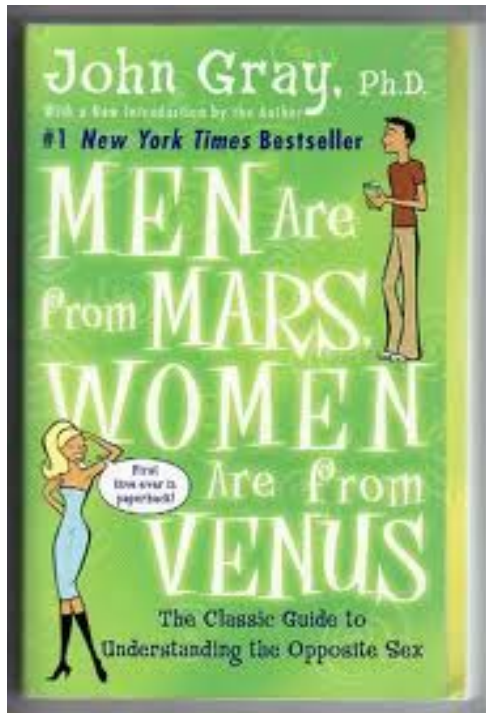
BASIS OF COMMON SENSE: First of all forget Stari Decisis for a moment. This lawsuit is in part designed to scream at the Courts and the United States to say "the way we are doing things is not working!" We need to return to the values of our founding fathers. The states decisions to over time make domestic laws reflect hedonism and not covenantal marriage has had terrible results. The domestic laws as they stand make getting married and having children an irrational decision, given the condition of the human heart. The fact that alienation of affection was at one time a tort before American society began sliding toward backfiring depravity should have not count against the fact that Defendants are in violation of the Tennessee common law. I agree with Justice Thomas that Stari Decisis is to be viewed with skepticism in the current landscape. The Courts have been polluted by the culture along with the rest of us. We need to have a major shift back towards innocence. That is what this lawsuit demands of the Defendants. That is what this lawsuit demands of the law itself.

179. Even though Apple and Hewlett-Packard do not care about the fact that their are engaging in the business of widespread alienation of affection, they have a duty to not sell products that trick their customers into addiction, exploit their biology, rewire their reward cycles, highjack their capacity for intimacy, destroy their families, crush their hearts, the hearts of their spouses, and leave their child emotionally wrecked, as the products of a broken home and a sexual porn-addiction-fraud-scheme. Apple and Hewlett-Packard, by selling their products in a way that causes their customers to form unnatural bonds with their devices, are interfering with martial contracts. This conduct is "OUTRAGEOUS!" Apple and Hewlett-Packard are at the front lines of the war on traditional marriage with Eric Holder, President Obama, and the liberal

media. They are literally making progress in the wrong direction. (*Whoever digs a hole and scoops it out falls into the pit they have made. Psalm 7:15*) This supports not only intentional infliction of emotional distress, res ipsa loquitur, products liability tort, and the kind of accusations that should reward Apple and Hewlett-Packard with criminal liability and their arrogant attorney's with the gift of sanctions. (*There is a way that appears to be right, but in the end it leads to death. Proverbs 14:12*)

180. **COVENANTAL MARRIAGE ACT:** Just because I'll invariably have legislatures reading these pleadings, I'll state here and now out that at the minimum our states (and possibly our Federal Government) must pass Covenant of Marriage Act. This act that was adopted in some southern states and requires all couples who enter into a special kind of marriage, a "covenant marriage," before getting married to go through a series of counseling before they are allowed to get divorced. Such a program will help the economy in a positive way because it will give psychologist a positive roll to play into society besides proscribing aderrall to children, making them worse than before because they are doctors are suffering from the same greed as the Defendants. The Act would create a checks and balance on marriage in the way that making Apple and Hewlett-Packard sell their products on safe-mode before they leave the manufacturing plant would. I beg the state and Federal legislatures to make our laws off of these kinds of publications. Not off of something GLAAD would suggest out of the world according to a self-absorbed person.





181. **FIGHT FOR TRADITIONAL MARRIAGES:** We must all shift our focus into fighting for traditional marriages. The media, the press, entertainers, the church, the government, must all shift to fighting to protect traditional marriages. We must shift back to honoring Judeo Christian values. We must revere the God of the Bible and return to Him. The God of the Bible is the genuine article. His ways are the only ways that work. Period. No more justifications. No more lies. No more excuses. No more liberal bubble. No more judicial narcissism. No more non responsiveness from the executive branch. No more falsities about technology saving us. No more persecution of Christians. No more biased Inspector Generals; No more IRS targeting. No more hijacking of our political system by 6 liberal Justices on the United States Supreme Court. We need the Federal Legislature to act. It is the only branch with its heart in the right place. Our leaders must push us back to towards Christian life-style and the public will follow. (Eric Holder, you and the President, need to go watch the movie Nelson Mandela. He saved South Africa by employing counter intuitive christian principles into policy making - the United States as the

world's leading Supreme Power cannot afford to have leaders who are unwise enough not to carry on an going and authentic relationship with the God of the Bible. This is not politics, this is the fact of the matter).

182. **CAMO ACCUSATIONS:** The alienation of affection allegation, which is a by product of the the dangerous and defective products that the Defendants sold to the Plaintiff in furtherance of their conspiracy with predatory pornographers, is not camouflaged as anything other than what it is: it is the fruit of Apple and Hewlett-Packards fraud and greed. It is the end result of their fraud, nefarious greed, dishonesty, and arrogance. It is additional grounds for liability under the totality of the circumstances. And only someone as arrogant and callous as these Defendants would have the nerve to suggest otherwise.

183. **INTERNAL THREAT TO NATIONAL SECURITY: THE POISON FROM WITHIN:** For Apple and Hewlett-Packard to be so cruel as to suggest that the fact that the alleged abolition of alienation of affection tort makes them immune from liability is the precise arrogance that makes their companies a threat to National security. As a combat veteran myself, I can attest first hand that Al Qaeda is not the greatest threat to our National security as the News would have us believe. Al Qaeda consists of people who are uneducated and misguided by a counterfeit believe system that has locked most middle eastern countries into war and third world status for good reason. What is the greatest threat to our National Security are the lies and policies that twist our thinking and threaten our families and children's integrity and innocence. The war overseas is a battle not with guns and bullets. It is a battle for the heart. It is a war zone for the missionaries. This is why we need the local churches to be more mobilized.

184. Apple and Hewlett-Packard are the great administrators of these vicious lies that

pornography is harmless, they they do not have a duty to protect their clients from being victimized and hunted by pornographic marketers, as their customers are using innocently using their products as intended. Eric Holder's non responsiveness in the face of this crime against humanity must be held accountable by a non-partisan Inspector General with actual character and integrity. By selling their products without safe-guards, Apple and Hewlett-Packard are putting our Nations most precious assets at risk. Like lust itself, they silently trigger poison from within that then manifests itself as destruction. Its outrageous, disturbing, distressful, malicious, fraudulent, and worthy of criminal liability.

46. As the Supreme Court stated clearly. "America is a Christian Nation." That should be the end of the discussion. Church of the Holy Trinity v. United States, 143 U.S. 457 (1892).

185. **FALSE FREE SPEECH DEFENSE:** What is also flagrantly outrageous is that Apple and Hewlett-Packard fraudulently hold themselves out as proponents of free speech, when they are not. (First of all, Apple and Hewlett-Packard are not state actors, they would owe no duty to allow any porn on their devices, but because they have a partnership and agency relationship with pornographers, they refuse to live up to the "family friendly marketing tactic). By selling the device in the condition that it is in, Apple and Hewlett-Packard advance the speech of sex addiction, stimulation addiction, and bonding with their inanimate object over the speech of love, intimacy, and family. Those forms of speech cannot coexist at simultaneously. In the same way, Joel Osteen could not hold a sermon in the strip club while pole dancers were at work. One would cancel out the other. Apple and Hewlett-Packard hold their companies out as being part of the effort to create a clean environment, only to turn around and sell their products without filters, which they know and hope their clients will be converted into technology addicts

after being hunted by the pornographic predators, who stalk us down from within the shadows of the Defendants' greed. Ask any victim in the sex trafficking business who was molested as the end result of these defendants scams. As slave victims, they will tell you that not all forms of speech are free. Pornography is not a protected form of speech. Modern day slave drivers.

186. Apple and Hewlett-Packard are so viciously arrogant that they rely on the argument of circular reasoning in saying that they do not have to sell their products on "safe-mode" because they do not have to sell their products on "safe-mode." The Plaintiff asserts that the Defendants have to sell their products on "safe mode" because the Defendants cannot distribute pornography to minors. This is what the law says, regardless of whether Eric Holder is convinced that his duty is to destroy the law in an unprecedented fashion. The Plaintiff is asserting that the Defendants have to sell their products on "safe-mode" because they are no different that the 711 who cannot allow their customers to leave the store with pornographic magazines that also contain some pornographic images intermixed with legitimate non-pornographic images. (The advertisements within Hustle Magazine by themselves would not be invalid material). The Plaintiff is stating that the Defendant has to sell its products on safe mode because it does not that the right to infect the Plaintiff or its customers with unwanted sexual addictions because they have unknowingly been left out in the open to be hunted by predatorily pornographers that Apple and Hewlett-Packard are in fellowship with (this is a concerted effort underscored by coexisting greed and perversion; this is a collaboration executed within the scope of line to maximize the Defendant's profits; this is a conspiracy of involving some of the greatest fraud of all time). The Plaintiff is demanding that the Defendants have to sell their products on safe mode because it is inherently wrong to burden the those who do not want to come in contact

with porn; instead of shifting the burden onto those who do. The Plaintiff is offering that the Defendants must sell their products on "safe-mode" because they are proliferating the demand side of sex trafficking, child exploitation, and the destruction of marriages.

187. Apple and Hewlett-Packard know that what is inside of their electronic devises is addictive materials. Just like electronic cigarette manufactures have a duty to warn their customers of the addictive components inside of their products, Apple and Hewlett-Packard have a duty to warn their customers of the addictive ingredients inside their products. The best argument that Apple and Hewlett-Packard can come up with is that because they are "Apple" and "Hewlett-Packard" they do not have to comply with the same laws that all of the other companies do. What they are saying in other words is that they are lobbyist, and because they contributed huge sums to the Presidents campaign, Eric Holder will not prosecute them.

188. But like my brother, Phil Robertson, I am a mere redneck from the Bible belt. And here in our Middle District of Tennessee, we have this thing called the rule of law. And the last I remember the Honorable Judge Campbell was not running for political office, so attempts to contribute to any campaign of his would constitute criminalized judicial bribery. The Defendants should be quick to call upon Celebrity Apprentice Winner John Rich, in asking him whether or not I can be bribed. More importantly, bribery will not save the Defendants in this matter, which will come as a shock to their conscious for them to think that there is more at stake in this world that dirty money. Money is not God and neither is Apple, Hewlett-Packard, nor Eric Holder. I risked my life in Iraq because the rule of law will prevail in the United States of America. Although the Defendants are correct in floating that the Honorable Judge Campbell is effectively my version of tech support.

189. **THE NOVELTY EXCUSE & HIDING BEHIND THE SHAME AND FEAR**

NON CONTROLLING SOCIAL RULE: Because Apple and Hewlett-Packard are loaded with technological experts, which establish the understandable existence of a fiduciary relationship with their non technological advanced clients and because their technological advance nature causes them to seemingly developed faster than the law on the surface, there are understandably not a lot of cases on this matter, which should have no bearing on the merits of this action by any means. Most people are too ashamed of their porn addiction to come forward. (That is going to change - see the movies Her and Don Jon.) What clearly explains the lack of cases on this matter is not that the claims of law and violations are novel, they are not. Rather, the reason for the lack of cases on this matter is that these issues are grounded in shame and fear. People do not want to come forward to admit that they have suffered from porn addiction because of pride and stigma. Yet, there are hundreds of millions of people who are experiencing a decreased quality of life because of Apple and Hewlett-Packard's vicious greed subjected them to the perils of their predatory pornographer coconspirators. Yet my injury was so devastating that I must come forward and bring these wicked companies to account and to comply with the sovereign laws of the United States and Tennessee. What kind of Military Officer in the United States Army would I be if I was to remain silent, while watching a handful of scoundrels pound our Great Nation under God into powder for their personal benefit, only to then turn around and die and face actual judgment?

190. Make no mistake, men are of honor and integrity are starting to emerge from the shadows in droves, fed up with the attack on traditional values in this Nation, which was founded on them.

(She Somebody's Daughter is loaded with men who are emerging from the shadows; churches across the United States have thousands of men in small groups have stepped out of the shadows). Any 12 step program would offer that one of the best ways for an addict to recover from an addiction would be to help others not become addicted or to help others overcome their addiction. There are pastors and psychologists around this country with thousands of stories of how the porn that Apple and Hewlett-Packard brought into their lives destroyed themselves and their loved ones. The filterless products sold by Apple and Hewlett-Packard are easily one of the greatest threats to the wellbeing of our collective world because of the immediacy of it. It is like a spreading epidemic and quiet plague that rears its ugly head in divorce court, television, and in the way we interact with one another. (Mylie Cyrus' tongue marketing plan is a symptom of the porn problem. The sex drug commercials clogging up our televisions at night are the byproduct of Apple and Hewlett-Packard's criminal enterprise). The Defendants all come as if they are an angel of light, masked in deception, motivated by greed, while using the weapon of pride and shame to keep cowardly men in the chilling darkness of deafening silence. Meanwhile, we men of it to our women to rise up and protect them. Women look to us men to have leadership and character, and we must stand against these defendants.

191. **AGENCY RELATIONSHIP WITH PREDATORY PORNOGRAPHERS:**

The Defendants cannot merely allege that they are not liable for intentionally selling dangerous and defective products to the Plaintiff because they are not themselves the actual pornographic predators sucking their customers into the devastating world of porn addiction. Nothing could be farther from the truth. The Defendants are certainly aware of the 4 A's of the porn they

distribute. The Defendants are in league with pornographic predators, who stalk their vulnerable customers. The Defendants are well aware that this is occurring and have received hundreds of thousands of complaints through the same non responsive complaint process that the Plaintiff initially explored before realizing that his complaint was completely ignored, despite the fact that he was threatening acrimonious, non-stop, never-ending, relentless litigation until these companies complied with the laws of the United States and the laws of all 50 states. The pornographic predators are acting with the actual, implied, and ratified authority of the Defendants. They are in concert. They are joint effort. They are unequivocally vicariously liable for each others civil and criminal intentional misconduct. The Defendants might camouflage themselves and clean cut, when they are profiteering on the backs of these predators. This is a criminal joint enterprise that is at the helm of child pornography distribution and sex trafficking proliferation.

192. **APPLE AND HEWLETT-PACKARD OWE A DUTY TO**
PORNOGRAPHY COMPANIES ONLY BECAUSE THEY ARE THE WORLDS
LARGEST PORNOGRAPHY MANUFACTURE AND DISTRIBUTOR:

On the surface one would think that Apple and Hewlett-Packard would owe no duty to porn content creators and that they would readily comply with my demand and the British Prime Ministers, when in fact they owe a major duty to porn content creators, who are helping them convert their customers from normal users to chemical dependents. In my original complaint, I implored Apple to comply with my demand "sua sponte" in good faith out of concern for all of us, especially our children, families, and future generations. The British Prime Minister echoed that call. I appealed to the the Defendants image that they have fraudulently projected. I was hoping to give them a way out

of the litigation I will subject them to. Yet, they have only served to confirm my fear that they are driven exclusively by greed and are in fact in partnership with pornography predators. Their refusal to comply with my demands and their Christmas commercial demonstrate this convincingly.



193. APPLE AND HEWLETT-PACKARD ARE WORSE THAN BACKPAGES.COM:

Apple and Hewlett-Packard are no different than Backpages.com, which is a major hub of

prostitution and sex trafficking in America. After the Craigslist killer incident happened (evidently a product of the Defendants' filterless devices), Craigslist shut down its adult section of its website because it is a private actor with a moral duty and legal duty not to encourage wrongful death. Since the only way to regulate the web is to regulate the device makers that allow us to access it, all of that business adult business went to Backpages.com. Backpages.com is well aware that their website is a huge hub of prostitution, but like Apple and Hewlett-Packard, they don't care about our families, daughters, and society. Backpages.com has employed a fleet of attorneys, who are just as bad as Professor Ford to protect them, as they work to destroy the quality of our cities and relationships, causing crime to sky rock.\. A large number of the prostitutes who post paid for ads on backpages.com promise to offer a "porn like experience" for good reason. Pornography is an advertisement for prostitution. Prostitution is the logical conclusion of porn conditioning. Apple and Hewlett-Packard know that, just like the prostitutes, the Johns, and Backpages do. None of them care because this all about greed. Even Eric Holder is in on this fraud circus. This is why other Nations think American Capitalism is evil, when it is not, if the hearts of people are by and large plugged into a relationship with Jesus Christ. *(They will be like a tree planted by the water that sends out its roots by the stream. Jeremiah 17:8)*

194. Apple and Hewlett-Packards ruthless strategy is to welcome, invite, encourage, ratify the proliferation of computer sex which is causing the users to become chemically dependent on their products. The Defendants' products constitute both the substance and the vehicle of delivery to feed this vicious viral addiction. After filing this action, Apple and Hewlett-Packard have responded exactly as Backpages.com did when federal law enforcement agents began confronting the website executives head on. They dug in for a fight because what I propose not

only impacts profits, it messes with peoples addictions. This is why I have received hundreds of death threats, after filing this case.

195. Professor Ford constitutes the poster child of the sleaze ball attorneys employed by the viral pimps at backpage.com, who work relentlessly to safe guard their clients devastating prostitution circuit in the wicked pursuit of money above all else. Not only does this record reflect that reality. The historical record will not forget this inextricable fact either. The public must know that Apple and Hewlett-Packard are not only just as bad as prostitution hubs like Backpages.com, their devices are so defective that they are responsible for creating and sustaining them.





196. **AT THE VERY MINIMUM APPLE AND HEWLETT-PACKARD ARE IN ON**

WHAT AMOUNTS TO AN INSIDE BANK JOB: At the very least, Apple and Hewlett-

Packard are no different than insiders at a bank, who pretend to be a champion for the bank customers, but who know that a gang of robbers that are in communication with are headed to the bank to lute the value they are charged with guarding for the benefit of their trusting clients.

So, Apple and Hewlett-Packard knowingly leave the vault wide open, and pretend to be surprised at the robbery. They allow the robbers to come in plunder the assets and victimize their otherwise trusting clients, who entrusted their safety and well being with these clean-cut bankers. These bankers know that once the robbers have made off with the goods, they stand to the primary beneficiaries of the heist, as they ultimately receive the lions share.

197. Over time, the bankers become addicted to the drug of greed and fraud. Its a matter of power. They continue to leave this door wide open for more and more robbers to victimize more of their clients all for the bankers ultimate benefit, knowing that their failure to shut this door is the primary source for attracting the robbers. In the public eye the bankers are assuring their clients that they are safe to ensure their assets with the bank, but behind the scenes

the bankers are ringing the dinner bell for the predators/robbers, knowing that they will repeat the benefit of these welcome vultures, who prey on their unsuspecting clientele. Meanwhile, law enforcement (Eric Holder and the President) is aware of this criminal enterprise, but because they are getting kick backs from the clean cut bankers in the form of political contributions, they do not do anything. It is vicious fraud cycle, and you know, if I was Sara Ford, I would be studying up on more than just class action lawsuits, I would be studying RICCO statutes because the America that I know will not stand for this. The few will be held accountable by the many in these kinds of situations. (In applying the analogy here, our hearts, chemistry, and relationship health are the assets that we have entrusted to Apple and Hewlett-Packard. We must take those back; we must make them account for their treason.)

198. If I were a U.S. Attorney, there is no question that I would reign down accountability on Apple and Hewlett-Packard executives. Why treat a symptom of the problem by going after the robbers. Even if they were arrested other robbers would take their place. No, I think not. Instead, I would pursue the bankers until their were safe guards in place to keep the vault of of our hearts closed. I am imploring this Honorable Court to help me roll the rock over this black hole that Apple and Hewlett-Packard have punctured into our world at the expense of the most precious commodities in the universe - intimacy, innocence, and families. I am begging the FCC to act. I am demanding that Eric Holder be responsive to to face consequence from the Inspector General.



199. **ACCOUNTABILITY IS AT THE HEART OF AMERICA**: Our founding

fathers new better than anyone, that "the heart is deceitful above all things, and desperately wicked: who can know it?" This is why they imposed a system of checks and balances. This case is all about the demand for checks and balances. Apple does not have any right to lie to their customers and expose you to the tactics of their fellow pornographic predators.



200. **OPEN SEASON**: Apple and Hewlett-Packard know that porn-content providers have a right to make porn, but Apple and Hewlett-Packard know that they have a legal and moral duty not to make pornographic content available to minors. Apple and Hewlett-Packard know that they have a duty not to sell their products in a manner that exposes their customers to unwanted addiction. Porn content providers and the Defendants know that President Obama has declared war on traditional marriage and that the FCC and Eric Holder are not going to hold them accountable. It is open season for these agents of demonic activity to prey on our society and poison us from within. They should be made to go make money in a different manner.



201. **CIVILIZED SOCIETY ELEMENT**: Apple's and Hewlett-Packard's sold me a product that was in a condition that was "so outrageous that it is not tolerated by civilized

society” because the sale was literally illegal. Neither Apple nor Hewlett-Packard bothered to see if I was a minor, when they sold me the device. They had a duty to card me, knowing that they could have been selling and distributing porn to a minor. Society requires that business not sell or distribute smut to minors. That is why we have the Department of Justice, the police, and the Constitution that makes us a rule of law nation. Society also requires that business not mislead their customers and surreptitiously expose them to pornographic vultures who will inflict them with unwanted addictions to the benefit of the seller. Civilize society will not tolerate that. In fact, the conviction rate for obscenity cases is in the 90th percentile, if the state district attorney's office or the U.S. attorney's office were to take Apple's and Hewlett-Packard's executives to trial, they would be convicted, because civilized society does not want people viewing pornography, while living in their neighborhood. *Riley v. Whybrew*, 185 S.W.3d 393, 399 (Tenn. Ct. App. 2005). *Lane v. Becker*, 334 S.W.3d 756, 763 (Tenn. Ct. App. 2010).

Civilized society has always demanded that their public officials zone porn shops on the difficult and undesirable parts of town. That is because the general public does not want pornography to be readily available. No, civilized society would to tolerate the sale, unless they have been slowly desensitized by pornography, which is even more reason to find the Defendants' misconduct intolerable. Civilized society is opposed to fraud by trick.





202. **HOTEL MANAGER**: When on the road, I some times stay at hotels. If the hotel manager was to give me a key that was to my room and no warnings. I would have the presumption that my room was safe from thieves, who would otherwise come to misappropriate my tranquility. I would not assume that I would need to go to a third party and have them fashion a lock on my door. Lets say, once in my room resting assured of safety, the hotel manager secretly called a band of thieves, and told them that I was in my room and ripe for the taking. In response, the thieves, snuck in while I slept, injected me with drugs unknowingly, and stole my money. They then gave kick backs to the hotel manager, who passed along some of it to law enforcement. Lets say, I then woke up under the influence of this drug, not aware of it. Lets say

the drug made me form a bond with the hotel (ultimately at the exclusion of the other). I began championing the hotel where I received a special feeling. I began buying their accessories from the gift shop and wearing their t-shirt, not realizing that the false advertising had caused me to let my guard down so that I could be drugged by the foreseeable third party beneficiaries they commissioned. So, night after night I kept coming back to the hotel, where I would pay their fees, and the same pattern would repeat. Meanwhile, the hotel was reaping the benefit of my dependency on a drug that I do not even realize that is being injected into me by their conspirators. So it goes with Apple and Hewlett-Packard and their agents of pornography.





203. **IF BRICKS AND MORTAR MOVIE THEATERS HAVE TO FOLLOW TCA 39-17-907 WHY DOESN'T APPLE AND HEWLETT-PACKARD FCC, ERICH HOLDER, AND GOVERNOR BILL HASLAM?** Under state law in every state, a movie theater could be sued or shut down if they allow a minor into a rated R movie or NC17. In our state, this law is codified under Tennessee Code Annotated, 39-17-907. Everyone is carded before entering because even adults want to know what a movie is rated. The FCC and Tennessee legislature understood that many American adults do not want to set evil before their eyes. (*The*

eye is the lamp of the body. If your eyes are healthy, your whole body will be full of light.

Matthew 6:22) The ticketing office at theater requires all patrons to show their ID before they let them view the content they have made available and distributed for Hollywood. (Unlike Apple and Hewlett-Packard they do not just let them access without first installing several steps). The content makers are not liable if the movie theater lets the patron in to see the movie on their screens. (A minor could not go an see the movie "Her" and "Don Jon" for example, but members of the jury pool could). Yet, despite Tennessee Code Annotated, 39-17-907, Apple and Hewlett-Packard are effectively selling miniature movie theaters without ratings systems to their customers without inquiring into their age. Then they are sending them off to watch what ever they want in private. Apple and Hewlett-Packard believe that because they are "Apple" and "Hewlett-Packard" they are entitled to expose their customers to worst rated content ever known to man. In doing so, they demonstrate why we have a rating system in the first place((they also prove that they believe that they are above the law). The Defendants movie screen come in the form of computer screens not much different than the screens at the movie theater. The computer is the distribution mechanism, like the tangible movie theater. Before the devices leave the Defendants' manufacturer plant, they have installed Safari and Explorer type software. The Defendants know the amount of vulgar content that is available through the Apps like Safari and Explorer before the defective device leaves the plant. There is no excuse for them to allow the computers to leave the plants without preinstalled filters in place to make the products legal. The evidence suggests and will be demonstrated that the Defendants are in business with several pornography content creation companies. The Defendants are exposing their customers to viewing content that would cause a bricks and mortar theater to be shut down and sued under

Tennessee Code Annotated, 39-17-907. The Defendants are in willful violation of the law.

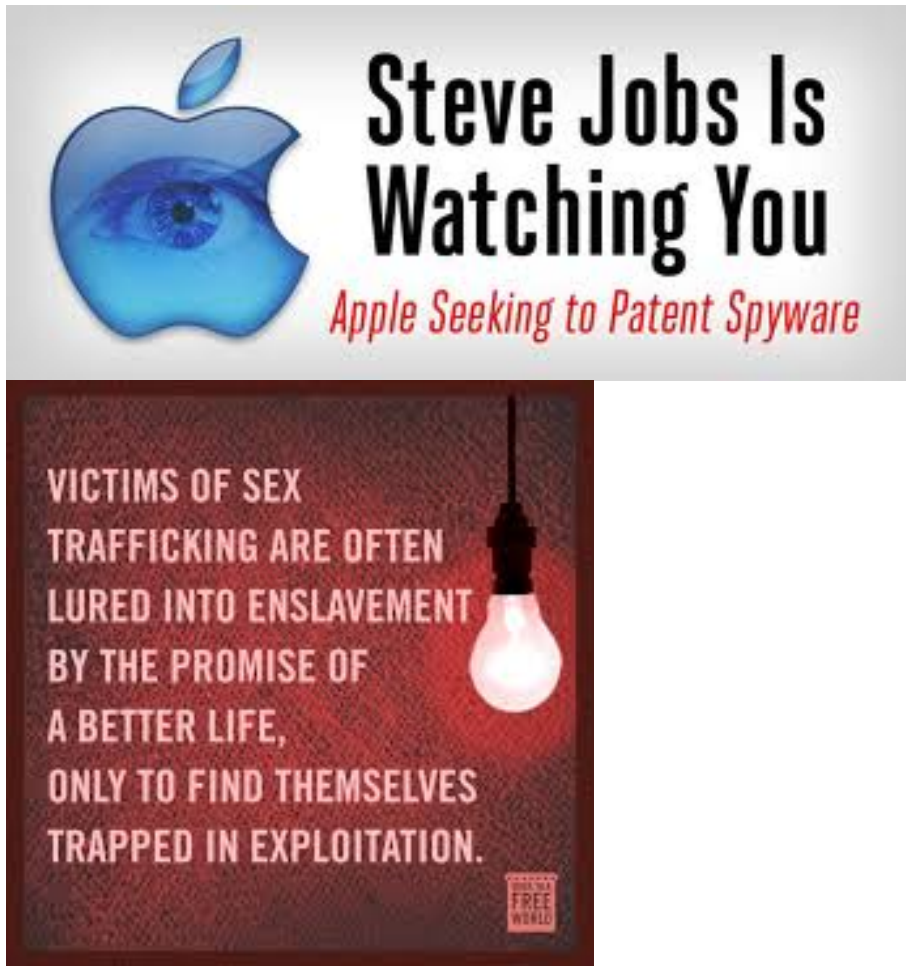




204. **THE DEFENDANTS PRODUCTS NEVER LEAVE THEIR CONTROL**

(THE SIGNIFICANCE OF iTUNES): I could not imagine a more slam dunk case for prosecutors than this one presents. (I pray for the day that prosecutors with hearts like Pat Trueman and Alan Sears can be unleashed upon the executives at Apple and Hewlett-Packard to remind Americans that we are a rule of law Nation; American women desperately need to see men rise up and defend their **HONOR**). The Defendants products not only violate laws like TCA 39-17-907, the Defendants are one of the few products in the universe that never really leave the control of the manufacturer. For the Defendants to argue through the likes of Professor Ford is merely one of their classic misdirections that they have been penetrating society with for decades. Lets just take Apple for now, Apple created a continuously store that is found on the desk top of all of their devices called "Apple iTunes." iTunes (besides being the symbolic demise of the music industry) is always under the direct control of Apple. Apple iTunes is loaded with pornography. (See Exhibits). So, this lack of control after the fact does not fly in view of a plain reading of Tennessee Code Annotated, 39-17-907. Apple is quick to constantly tempt their customers with pornography because they pray that they will masturbate to their machinery and create a strong/unnaturally/unhealthy bond with their products.



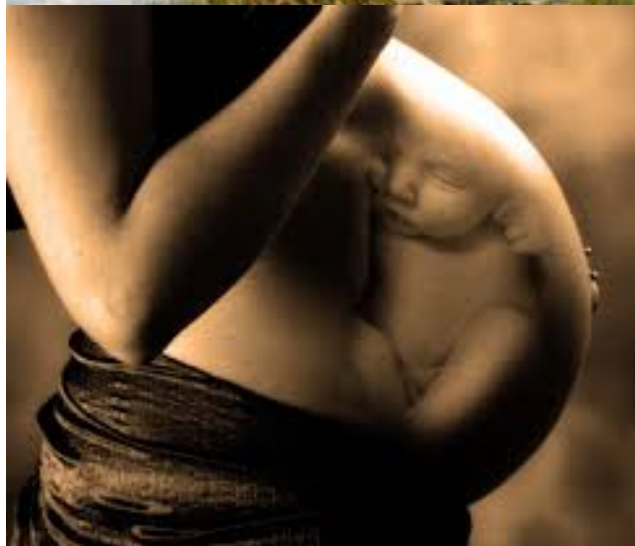


205. AN EVEN MORE COMPELLING ARGUMENT THAT APPLE AND HEWLETT-PACKARD PRODUCTS ARE UNIQUELY DESIGNED TO NEVER LEAVE THE STORE:

What is even a more compelling argument is that fact that after a customer leaves the store, Apple and Hewlett-Packard are regularly sending out updating software. Apple and Hewlett-Packard products are in constant contact with "the mother ship." (Like a demon communicating with the Father of lies). Once a toaster leaves the electronic store, the blender does not get updates from the manufacture. This is not the case with Apple and Hewlett-Packard are in constant contact with your device even after you leave the store. It is like buying a tick to see a movie that never ends. Once inside the theater the personnel still have dominion over the patron,

who cannot sneak into seeing "Her" after buying a ticket to see "The Hobbit." Buying an Apple and Hewlett-Packard device is like buying a ticket to a movie that never ends. Apple and Hewlett-Packard are under a legal obligation under laws like Tennessee Code Annotated, 39-17-907 to keep minors from seeing pornography and for warning their customers about the ratings of the material. Apple and Hewlett-Packard would be closer to being in compliance to the law if they would simply stop selling us dangerous and defective devices and bothered to comply with child obscenity laws and laws like Tennessee Code Annotated, 39-17-907. It is patently outrageous that Apple and Hewlett-Packard would believe that they are a "special case" that is not subject to the same laws as all of the other manufacturers. If Apple and Hewlett-Packard would set their egos aside and adopt the proposed demand issued by myself and the British Prime Minister, maybe they would have a better chance of narrowly escaping the title wave of civil and criminal liability that will come down on them inevitably.

206. RATIONALE: Speaking to the FCC and Judge Campbell, the rationale for why the demand I and the British Prime Minister must be adopted is to protect children who have not yet encountered pornography. As far as it is possible with in our means, we collectively have a duty to shield their eyes and protect their innocence. This is keep them from encountering the pornography that caused addiction and inflicted my life terribly. By making the Defendants set up a system that imposes actual accountability, we are setting a good example for them and future generations. Our children's children for generations to come will respect us if we adopt this plan to safeguard one another's hearts. This is an act of love. To reject this proposal is an act of cruelty.



BUILDING ON OUR LEGACY

**207. THE RATIONALE BEHIND POLICIES THAT DO NOT RECOGNIZE
SAME SEX MARRIAGE IS THE SAME ONE SUPPORTING THE DEMAND HERE:**

(The A&E case is slated to be consolidated with this action, which is a case that centers around the opposition to same sex marriage and the prevention of the persecution of Christians). The reason that our State and Federal laws must be crafted to not recognize same sex marriage is because such laws send a terrible message to children. Although no one was born with a gay gene, we were all equally born sinful, broken, and in need of savior. The laws of the United States on the state and Federal level have always been fashioned to point us towards that savior, Jesus Christ. When ever laws (such as abortion or the legalization of drugs) point people away from this savior, our people suffer. What we should avoid is what Russia has done, you don't make same sex relationship a crime. But equally contemptuous is what President Obama just did by sending a gay athletic delegation to their Country in making a stand for something as equally as evil. We should be cautious not to punish one another for being human, but we should not steer one another in a direction that makes us spiritually inhuman either. The heart is the wellspring of life. It must be guarded and protected.

208. I'M NOT TRYING TO CREATE A COMMAND AND CONTROL

ENVIRONMENT: As any employer, Judge, and politician knows, there is a balance between

freedom and order. I do not want government to create command and control environments. Too Many rules is not necessarily a good thing. (Think of all of the people in the government, who we know, who are like Javert the Prefect in Les Miserables - not a good thing). Too few rules leads to bondage. Yet, absolute freedom is no freedom at all (President Obama does not understand this). The proposed solution presented here is reflects the spirit of all of our domestic laws and the spirit of common sense. The solution is a big step closer to the perfect balance between freedom and order. It should be instituted by the FCC, department of Justice, and the Courts as I have demanded.

209. LIST OF DOS AND DON'TS DOES NOT WORK: One reason I keep referring to Jesus Christ throughout this complaint is for the simple truth that all things revolve around Him. (Even the trees point to God). In life, giving one another a list of dos and don't, simply does not work. When I was in high school and college, it seemed that everything that Hollywood was telling me was fun was prohibited. For example, if we are to tell high schoolers "don't do something," you must follow that with giving them something "to do." By imposing the accountability system on ourselves, we are telling one another "do not have lesser forms of promiscuous sex outside of traditional marriage and that it is important that we set before our eyes because it shapes the heart." We are telling one another to act with honor, prize intimacy, cherish innocence, strive for purity, and hold sex as sacred. We are telling one another that through accountability abstinence is possible and that we should strive to hold out for sex with just our spouse, like Jase and Missy Robertson did. (See the A&E lawsuit).

210. There is a pretty porn star named Bibi Jones, who after years of being in the business decided to "get out" because her heart could not take it any more; she felt ashamed and

empty. Girls are not designed to be porn stars, any more than they are designed to be lesbians.

Pretty Bibi released this tear jerking video about her decision to leave: <http://www.youtube.com/watch?v=1XMXvITVq5Y>. However, after a year of being out of the business, she decided to return because she found no alternative to live for after separating herself from the business. (If she had be draw to the church and found purpose in life through serving Christ, she would have never returned.)

211. This is why separating the church and state to severely is a terrible decision. Lets consider the recidivism rate for prisons. Shows like Locked Up demonstrate that the jails are cruel and terrible places. No transformation of the heart is taking place in our correctional facilities because Jesus Christ has a monopoly on being able to transform hearts. This is why the local churches must rush to the aid the chaplains in the local prisons so that inmates have a better chance of encountering the transformative Creator, whose word is the primary foundation of our Justice system.

212. I ask the Court and Defendants to consider Tajuan McCarty's testimony. Tajuan grew up without a father. She was sucked into the sex trafficking circuit at a young age. She was arrested numerous times for prostitution. But jail did not change her. Incarceration merely temporarily kept her from hurting herself and hurting others through engaging in lesser forms of sex. It was not until she came to know Jesus through working with the Birmingham Dream Center (which was fashioned off of the Los Angeles Dream Center) that she came to know Jesus and completely revolutionize her life. She has been redeemed and transformed from the inside out. She now runs the Well House, and helps other girls come to know the love of our Heavenly Father that rescued her from a life of misery and inevitable death. (<http://www.cbn.com/tv/>

2818643274001). Apple's and Hewlett-Packard's are sold in a condition that fuels the sex trafficking industry that she is fighting against. Unlike Eric Holder, President Obama, the Defendants, and the Defendants lawyers, Tajuan is part of the solution, not part of the problem. She strengthens National Security and an has taken what what was meant for evil and turned it into good. I am simply asking that the Defendants set aside their greed and join Tajuan McCarty, the British Prime Minister, and hundreds of thousands of other individuals fighting this cancerous evil.

NOW COMES: "Hi your a MAC (Apple) and your a PC (Hewlett Packard) and I'm Chris Sevier (disgruntled Judge Advocate)," and I'm here to demand to that these defendants comply with child obscenity laws and that they and the Untied States' Government be responsive to the call of the British Prime Minister to form a joint task force with the UK to make pornography online more difficult to access. [It is my unapologetic intent to respectfully ask Senator Michael O'Reilly, U.S. Attorney General Eric Holder, and the honorable members FCC committees in the House and Senate to be responsive to this Federal action].

213. JOINT TASK FORCE WITH THE UNITED KINGDOM: I am demanding that the defendants and Federal Government accept the Prime Minister's, David Cameron, July 23, 2013 call to join the United Kingdom to push the world back towards a place of innocence by promulgating blanket laws that require the installation of pre-set filters on all devices that connect to the internet to protect children, marriages, and safeguard the human heart from the perils of smut. If this task force had been in place before I had purchased these defendant's products, I would not have sustained the injury that gives me standing here to bring this action. How dare any one in this Country, especially these defendants, even consider not entering into a

joint alliance with the United Kingdom on this matter, given the well documented evidence of the adverse impact that pornography online is having on women, children, and families, shifting our culture towards deprave heart prospectives. For anyone to object to this sensible solution is to admit that they are an advocate of child pornography, child exploitation, and sex trafficking. They should be labeled as such. The Witherspoon Institute compiled a report that is attached to this action in support of my cause of action under res ipsa loquitur, and the device makers not ignore. Although Apple and Hewlett Packard hold themselves out as law abiding, they are inescapably in direct violation of child obscenity laws in every state in our union, as they sell products in an "unsafe" to minors in a manner that erodes the quality of life, hijacks dopamine receptors, destroys the capacity for intimacy for both men and women, and ruins lives in countless other ways. What I am proposing constitutes an easy fix with potentially a high reward and is consistent with the values upon which our nation was founded. Manufacturers should not have the right to allow their products to be used to unduly exploit the male and female biology in harmful ways without warning. This lawsuit is about porn addiction, not approval addiction, so I am not here to win any popularity contests. I am here to stand for what is right and bang the drum as loudly as possible until the Federal Congress wakes up and passes a laws that curbs the harmful impact that the device makers are having on the world, while imploring the Courts to do their job to enforce the existing products liability and child obscenity laws in the event that the device makers refuse to comply with the sensible demand here out of illegitimate greed. On July 23, 2013, the British Prime Minister called our nation to form a joint task force with the UK to push our world back towards innocences, and the Defendants and Congress should respond to this call for the sake of our children and generations to come. Standing up for what is right is not

"intolerance" and "hate speech," it is an invitation to life. If Apple and Hewlett Packard will have the character to step forward and join this task force, I will drop this lawsuit because policy change will do more to make me whole than a personal payout that I certainly entirely to in light of the evidence.



FIGURE 206.—Helmet, T85, later standardized as Helmet, M1 (left), and Helmet, M1917&1 (right), April 1941.



214. NOT WORLD POLICE, BUT AMERICA HAS A HIGHER CALLING: On September 10, 2013, President Obama explained to our Nation that although America is not the World Police, we have a higher callings to help humanity out of the abundance of our prosperity taking the moral high ground on matters that protect children. Such a position was unequivocally directly consistent with the spirit of Americanism that has marked our Nation since its inception. The President has called for our Nation to be responsive to Syria's nefarious use of chemical weapons that killed 1,400 civilians to include children in violation of set in place regulation, as the evidence substantiates here: <http://www.youtube.com/watch?v=EMUkGZgV3UE>. The President implied that America should engage in the transferred right of self-defense to protect children around the world following self-evident universal law. The President suggested that we as American's have a call to be responsive in the face of overt evil, even if there are minor risks and set backs, as a result of our responsiveness because we have a higher calling on our nation. The same exact rational applies squarely to the instant case. Apple and Hewlett Packard must sell their products in a fashion that will protect millions of our children and our families at home and abroad, by coming to terms with the scientific evidence that demonstrates that porn that is accessible through their devices is not harmless. Non-responsiveness is inexcusable in light of

the growing reports like those issued by the Witherspoon Institute, porn-harms.com, yourbrainonporn.com, and countless other organizations that fight sex trafficking and child pornography. Our nation has long since acknowledge through child obscenity laws that what we set before our eyes does impact us. We need to invoke our higher calling in this matter and join with our allies in the UK to push our world back towards innocence, by selling devices that connect to the internet with filters that blocks porn for minors, and protects those who are not interested in having their lives devastated by poisonous and addicting obscene content. Even if there are some minor set backs or inconveniences in implementing this, it is worth the slight burden and consistent with our Nations higher calling to protect children at home and across the world. To those whom much is given, much is expected. Our nation is in a position of leadership and prosperity and we have a duty to set a positive example for other nations regarding smut, as we continue to be the world leader in champion human rights. All of us, to include these defendants have an affirmative duty to protect women and children. We need other of our allies to join this task force to fight an unseen war that is waged for our hearts. Countries like France, Germany, Canada, Russia, and should be part of this task force that will decrease the demand side of sex trafficking which is a growing international problem that we must be responsive to. Prospectively, hundreds of millions of children and marriages could be protected by adhering to this higher calling here in a matter that will keep families from breaking apart and improve the way that men and women view and treat one another. Sex is something that we should hold in high esteem. It is sacred, precious, and can create life. Accordingly, the implementation of this policy is consistent with a call to push our culture back to a place of honor, integrity, intimacy, and innocence, where the capacity to experience transcending love is safeguarded.



215. HOW A JOINT TASK FORCE WITH THE UK ON THIS MATTER IMPACTS THE

WAR ON TERROR: I hate terrorist more than just about anyone who works at Apple or

Hewlett Packard. I joined the United States military in response to the attack on September 11,

2001. I have been personally attacked by insurgents in Operation Iraqi Freedom, which is more than just about anyone at Apple and Hewlett Packard can say, who opposes this scientifically based proposition. But just hating one's adversary is an insufficient response in 2013. We have a duty to understand what motivates their violence in an effort to be peace makers wherever possible in the pursuit of overall justice. The evidence demonstrates that terrorist attacks are usually motivated by some kind of disdain towards western culture practices and how our culture posses a threat to shift traditional family values in middle eastern away from the sacred norms. Of all the adverse by-products of western culture, online pornography with is easily accessibility and abundance, is probably having the worst effect of all. Instead, of fighting the war on terror with guns and bullets, perhaps device makers, like HP and Apple, and Congress can help fight terror here by the adaptation of this common sense policy joining "joint task force." Doing so serves to counter jihad, while protecting women, children, and marriages. The terrorist have a point in that many of our western policies are irresponsibly dangerous, even if their means to communicate objection are entirely condemnable.

("All of the terrorism that is currently on the planet is really an extension of a fundamentalist urge to protect an old way of sexuality and family that is shifting." - Patrick Carns)



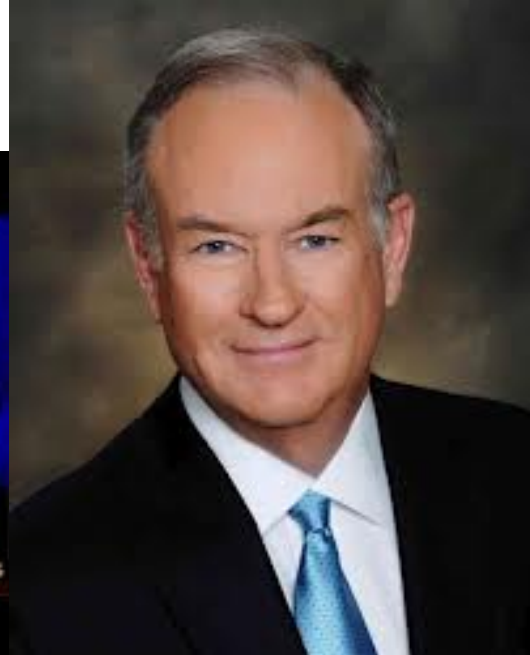


216. O'REILLY, LETTERMAN, LENO ARE GIGGLING ABOUT CUTTING DOWN

THE DEMAND SIDE OF CHILD PORNOGRAPHY AND SEX TRAFFICKING:

Normally, I prefer a simple thank you instead of being laughed at and persecuted, but such inappropriate persecution and laughter only further proves the need for more safe guards for our hearts because it demonstrates how out of tune with reality our nation has become. Our culture has shifted into something terrible. While O'Reilly, Leno, and Letterman might have thought the original complaint against Apple was funny, women who are chained to radiators in places like,

Thailand, Malaysia, and Greece, who are being sex trafficked by American tourist, who got their start down a voyeuristic path of sexual compulsion after accessing pornography on their Apple and Hewlett Packard, are not laughing. Women and children are being irreversibly traumatized and tortured because of how pornography plays out in the reward cycles of the brain. There is no doubt that our society is shaped by how men and women treat one another. To suggest that online pornography is not adversely shaping how men and women perceive one another in this country and elsewhere is laughable. Online pornography creates crushing expectations about sex; it yields arousal addiction, compulsory sex addiction, voyeurism, and a litany of social ills that were the basis for obscenity laws in this Country in the first place. Instead, pornography is shifting our collective prospective to objectify women. The capacity for intimacy for both genders is greatly diminished.





217. WAKING UP THE FEDERAL CONGRESS: [Waking up FCC committee, Senator Michael O'Reilly, and U.S. Attorney General Eric Holder. Do not leave this matter up to the Courts and to greedy device makers]. If any federal Congress members are reading this, I would like them to take something into consideration along with the Defendants: Apple, Hewlett Packard, and other devices makers are violating obscenity laws by selling devices without filters to minors. I did not go to Iraq, and risk my life on the rule of law missions, only to have laws like obscenity ones be converted into "blue law." Apple and Hewlett Packard products are crossing state lines, therefore the United States Congress has the right to regulate this criminal misconduct under the Commerce Clause of the United States Constitution. Federal Question jurisdiction is invoked accordingly, and Congress should be responsive in the same way that Parliament in the UK is to wake up to these matters. Congress needs to restore Country to have a culture of honor, integrity, purity, and virtue. The success of capitalism depends on such qualities in the hearts of the people. Congress can start by passing a law that requires all device makers to install filters that automatically block pornography upon purchase. If the purchaser is under 18, device makers

should not provide a password to remove the filters because doing so violates our states obscenity laws that protects our children's innocence. If the purchaser is over and would like the filters remove at their own risk, Apple and Hewlett Packard should required the customer to take the initiative to acquire a password "opting in." Otherwise, an absolute band on pornography would violate the First Amendment and that would be unconstitutional. "Intentionality" should be shifted onto the individual user who want to see porn by choice, not those who desire to avoid it. Our zoning laws demonstrate that our Country has always held that pornography featuring adults is not illegal but that it should be not readily accessible. We are wired for both sex and intimacy. It is self-evident that men and women were born with corresponding sexual features, which confirms that. Online porn should not be illegal for adults, and we should not prosecute one another for merely being human. In fact, porn should not be prohibited in the same way that alcohol should not. But like in the case of alcohol, there needs to be strict restrictions on online pornography, which will make all of us freer in the long run, as it shifts our perception of sex in a healthy direction. Like in the case of alcohol, we need enforceable drinking age mechanisms. Although there is not a magic number of the amount of drinks one must consume before they become an alcoholic, we know that over time too much drinking can generate the disease of alcoholism. The same can be said of pornography, and stricter regulation is necessary to protect us from us. (The Witherspoon Institute's report lays out a much more compelling case on these things than my sentiments).

218. Our Congress has always recognized the perils of smut and have legitimately regulated the time, place, and manner of this speech in a way that makes it inconvenient for the average man to be inadvertently harmed by the corrosive content. This is why zoning laws have always made

porn shops relocate to the less desirable parts of town. It is not by mistake that bricks and mortar porn shops are often in the seedy parts of town or out along side of the highway. This lawsuit asks the products makers to protect us, by making it harder for us guys to access content that could yield the litany of problems the pornography creates. Accordingly, Congress should exercise leadership and respond to the call of the British Prime minister, pushing our nation back towards innocence by passing a law that shifts the burden onto those that want to see porn to have to take the step to remove filters instead of placing the burden on those who do not want to see porn to have to be proactive in avoiding it. This proposal is not just equitable under the rubric of common sense, this policy comports squarely with the rational basis test connected with the Constitutionality litmus test of matters arising under the First Amendment of the United States Constitution. Those of us who are male, who prefer to maintain our capacity to bond and experience intimacy, as opposed to becoming addicted to intensity-based thrill-seeking-sexually-compulsive-voyeurist, should not be punished by having the burden to block content that appeals to us but damages our neurological hardwiring, destroying our capacity for a relationships by depleting our oxytosen and bonding capacities. As a person of achievement and with a strong honor core myself, the quality of my life would have been much better if that policy had been in place when I purchased these defendant's products. It is intolerable for Apple and Hewlett Packard to have sold me a product, which they hold out as being safe, when they are aware that it simply not the case. Those who do not want to see porn should not have to be concerned about stumbling upon or being sucked into it by internet marketing companies, who tirelessly exploit the fact that us guys are stimulated visually by our attractive female counterparts. In passing such a law, Congress will be acting consistently with realities of objective biology and protecting us

from ourselves and moving our nation and world back towards innocence in step with our brothers and sisters in the United Kingdom. This is something to be excited about, not resist. While device makers like Apple and HP should "sua sponte" agree to employ such a sensible policy and not even consider giving anyone any push back, the Federal Congress must start passing legislation that makes the cyber-world, and those who make it available on their machines, subject to following the same laws as the entities in the analog world. "What one cannot get in the store, they should be prohibited from accessing online," explains the British Prime Minister. The evidence demonstrates that our nation as a whole needs more regulation over the free flow of information on the web, which is having adverse physiological, psychological, and metaphysical effect and hurting our economy by making many business incapable of monetizing assets that would otherwise be valuable. Besides sucking creativity out of the world by failing to provide authors, photographers, artists and incentive to create enriching works of art, the web is rife with poisonous sexual content that is converting more men into consumers of sex trafficking and child pornography than ever before in human history.

219. SUPER BAD: If Apple, HP, and Congress want to get an idea about what the landscape of minors looking at porn on line looks like, just watch the opening conversation between Seth and Evan in "Super Bad." Their conversation underscores that the youth are big time into porn because of our collective non-responsiveness.



220. METALLICA: When Lars from Metallica sued Napster for the rampant copyright infringement online that has subsequently tanked the music business, thanks to the lie that free flow of information was good for the economy, he sued the wrong party. (Human nature, being what it is in general, will always be flawed and broken - when given the opportunity to pay for something or take it for free, most people will steal.) Like porn content providers in this case, Sean Parker was an opportunist, who was taking advantage of human nature, exploiting the lack of enforcement for his personal benefit, given his own greed and disregard for the welfare of his customers. Temptation to exploit the under regulated internet is no different than temptation to

look at porn after being bombarded by marketers, who set out to entice and trick men into visiting porn sites with through pop-ups of temptresses and false advertising.

Metallica should have sued device makers like Apple and Hewlett Packard in tort for breach due to superseding cause and foreseeability factors. The internet is not some space vacuum. The world wide web is merely a part of a sum that is a device created by manufactures, like Apple and HP, that sits in our homes. Without the device that allows customers likely myself to use the software to log onto the internet, there is no internet. Without the ability to log onto the internet the downsides of the internet are eradicated. Sean Parker should not have been sued for creating Napster any more so than porn content providers, who are exploiting the fact that they can get teenaged hooked on their products, should be primarily targeted because of Apple and HP's molestation of child obscenity laws. Device makers, like Apple and Hewlett Packard are the head of this snake. Because of Apple and PC's disregard of the rule of law, people, like Sean Parker and Sex traffickers, are faced with an overwhelming temptation to take advantage of the platform to exploit others for their personal benefit, even if it victimizes others. Meanwhile the tax payers have to pay the cost of by dealing with the fall out of pornography, sex addiction, single parent homes, and voyeurism, and crimes of passion relating to jealousy, rage, envy, shame addiction, depression, detachment, low self-esteem, and wrongful perceptions of one's self and others. We don't need more sex offenders or prisons in this Country, we need more preventative measures that prevent people's hearts from being poisoned so that their will be fewer people in jail, fewer broken homes, fewer sex trafficking victims, and so forth. Proverbs 9:10 and 1:7 state that "fearing God is the beginning of wisdom." By not being responsive to this problem we are on a projectile that is not going to end well. We are making life worse than what it could be by not

acting.





221. GROCERY STORE ANALOGY: If a minor was to go into a grocery store and put milk, eggs, and a Hustler magazine in his shopping cart, he would be stopped by the check out clerk the clerk, who would let him leave with everything but the porn mag. Otherwise, the grocer could be subject to prosecution for violating child indecency laws. Here, Apple and HP's stores are no different than the grocery store in this analogy. Apple and Hewlett Packard retailers are allowing the minors to check out with infinite pornography of all variety amongst other content items that are legitimate. Its not just the content of one porno-magazine on line. There are torture porn, child porn, group gang bang, simulated rape, and on and on. Apple and Hewlett Packard have the ability to easily filter the bad and leave the good, which would help all of us. Apple and

HP have had the ability to filter porn for years, but arrogance has caused the companies to be non responsive to a

problem that is getting out of control and manifesting itself in society in horrible ways.

222. When checking out of their store, Apple and Hewlett Packard should not allow the minor to leave with pornographic content, any more than in the grocery store analogy. Currently, MAC and PC are willfully thumbing their nose at obscenity laws and allowing marketers to exploit the male biology by sucking them into addicting porn sights. Failing to make reasonable efforts to comply with these laws should cause the Federal Government to prosecuted Apple and Hewlett Packard for overt noncompliance, if necessary. (Its better for the U.S attorney's office to prosecute the few bad apples at the top, then the many at the bottom, who will simply be replaced. It is nearly always better to address the disease, not the symptom.) Like Pontius Pilate, Apple and HP should not be able to legitimately assert that their hands are clean from these affairs and finger point elsewhere.



222. THE SNEAKY GROCER: I am not a minor, so why should filters be pre-set for adults one might ask? Back to the grocery store analogy, when I am checking out of the grocery store as an adult, I do not want the grocer to slip a porn magazine in my bag as I check out, even if I was entitled to have a free porn mag under the grocery store's policy. I do not want the grocery to slip other addicting products in my cart as I attempt to leave - like cigarettes, beer, meth, cocaine - even if these items were free and I was entitled to them under the stores policy. Instead, the grocer should require me to ask for a copy of the free porn mag, since the recent study's are proving that porn causes compulsory sexual behavior, arousal addiction, can cause one to be fired from their job, proliferates psychological traumatization, and so forth. I should be required to take the additional step to ask for the porn magazine to be added to my cart. Apple and HP should not just assume that their adult customers want access to content that could cause them to

be fired from their job, ruin their entire family, and generate addictive thinking.

223. The grocery is otherwise taking away "intentionality" from adult males, encouraging intensity based sex, while damaging their relationships and the customers capacity to form bonds. I should not have to take the tricky steps to keep the grocery from slipping the free porn mag in my cart, as I check out. I should not have to be on guard that the clerk might put addicting content in my cart. The checkout clerk is in the better position to be on guard for me. If the sneaky grocer were to have placed a porn mag my bag surreptitiously, once at home in the privacy of my room, if was to stumble upon it, I might be overwhelmingly tempted to sneak a peak in "moment of weakness" because "Hello, I am biologically and nero-chemically designed to love looking at naked girls." Fewer things are better, but to get the best of this, it is all about context. Yet, this lawsuit sets out to establish here what we know about other areas, like in the case of cocaine, that something make us feel so good temporarily that they are bad for us. Seeing sexual acts or a naked woman is such a large dopamine rush and is so special that context control by the viewer should be valued and protected by those who could influence it to an unduly degree. Us guys should not have to apologize for how the laws of attraction play out on us. We should not be punished for being hardwired to be attracted to by sight. But we should expect Apple to protect us from being unreasonably exposed to content that tempts us and exploits our biology that causes adverse shifts in perception and neurological hardwiring. We should have to intentionally ask to have access to such enticing temptations by seeking a passcode from the manufacture to access smut.

224. Just because us guys, like something does not mean that it would be good for us to have it. Restraint is a foundation of masculinity after all. Honoring women in this way will

make all of us better men in some way given what a policy like this will communicate to our female counterparts - that they are special and worth protecting. 50% of the world's population can attest that they are visually stimulated and other other 50% can attest that they do not want their significant others looking at porn starlets, when it comes to being naked. Apple and HP are effectively like the grocer in this analogy, who slipped the porn content in my cart as I check out without giving me any warnings. Apple and HP provided no warnings that porn was addicting or harmful as they reasonably foresaw. By not selling their products on safe mode Apple and HP are doing their male and female customers a disfavor by placing guys in a situation of prospective overwhelming temptation. By selling computers on "safe mode" to adults and making the purchaser take the initiative to acquire a password to remove the filter, Apple and HP can sincerely say that their hands are clean from any adverse consequences that follow from their costumers intentional use of their products to access pornography at their election.

225. CALLING ALL US ATTORNEYS AND LAW ENFORCEMENT AGENTS

WHO WORK IN CHILD PORN AND PROSTITUTE TO BE RESPONSIVE: Lets be clear

up front: what I am not here to do is to threaten criminal liability against Apple and HP's CEOs so that I can get some large personal payout in the instant lawsuit, regardless of the validity of the claim for personal pecuniary damages. Many of my opponents to this concept in the general public have such polluted hearts that they assume everyone else is as selfish and rotten as they are (which supports the need for filters as we must accept that human nature is bad in general). My proposed rule 68 motion filed earlier clarifies that my paramount demand is simply that device makers and the United States heed the call of the British Prime Minister in joining the joint task force in aligning with common sense. If this is done, I'll drop the case because the

policy implementation might make me whole enough to settle under such terms and conditions.

Yet, I call upon the U.S. Attorney's office and state prosecutors to begin prosecuting the CEOs of device making companies for violating child obscenity laws in selling their devices not on "safe mode" to minors. I have been privy to the same information and seminars that Apple and HP have that are being put forth by federal law enforcement, who have linked an increase in online pornography to a correlating increase in organized crime, objectification of women, sex trafficking, and child pornography production. In July 2013, I met with the FBI field office in Tennessee and Texas and the United States attorney's office, all of whom agreed that Apple and HP may very well be in direct violation of child obscenity laws and "could be subjected to prosecution" for failure to sell their devices on "safe mode" to minors. Apple and PC cannot hold themselves out publicly as law abiding entities, and refuse to comply child obscenity laws. While the burden proposed here is light on the device makers, the benefit for the rest of us is great. Our wives, girl friends, grand daughters, and daughters will appreciate our male leadership on this for generations to come. We owe it to them to act in this regard. Apple and HP have the technology and are in the best position to make reasonable attempts to block pornography.



226. **DEVICE MAKERS CANNOT SUCCESSFULLY INVOKE THE EICHMANN DEFENSE RAISED IN THE MOVIE HANNAH ARENDT**: President Obama just acknowledged that our Country sometimes recognizes universal law and even compared Bashar al-Assad to the Nazi leaders in making the case for action in Syria (So that Syria does not become another Rwanda). Because I love studying World War II, permit me to draw an analogy. At the trial of Adolph Eichman, the former Nazi administrator's best defense was that while he admitted to being in charge of putting millions of Jews on the trains for transportation, he was not responsible for their destination or what happened to them after arrival. Here in the instant case, Apple and HP, can not legitimately raise this kind of defense regarding their customers, who leave with the store with their products. Eichmann knew or should have known that he was placing those prisoners under his care on a course to meet their death in nefarious concentration camps. Eichmann had a duty to the welfare of the people under his charge that superseded lawful orders based on universal self-evident law. Therefore, Eichman was guilty of war crimes against humanity, even if he was obeying German law. When MAC and PC sell their devices to minors and adult males they cannot argue that they do not know that their male customers are on a

course to being exposed to abundant online pornography and all of the dangers that associate with it. By selling their products on "unsafe mode," Apple and HP are setting up their customers for relationship problems and possible extermination of their capacity for intimacy. It is unreasonable for Apple and HP to suggest that they are unaware that millions minors are not using their products to access porn. (See the Witherspoon Institute Report) and the data offered by MoralityinMedia.org.

227. **Statistic:** Upon information and belief, Apple and HP know that 2/3rd of minors are watching pornography online while doing their homework.

228. **Statistic:** Apple and HP know that the porn industry generates a revenue that is more than major league baseball, the NFL, and NBA combined annually.

229. **Statistic:** Online pornography is a foundational source that is creating one of the biggest problem in schools, it is one of the biggest problems for child injury, it is one of our biggest problem socially in how it is reshaping prospectives, and yet, Apple and HP are not selling their devices with filters.

230. **Statistic:** Apple and HP are aware that Illegal child porn websites are generating 3 billion a year in our country. 11 Billion is spent on prostitution. 5 billion is spent at sex clubs.

231. **Statistic:** Apple and HP are aware that 2/3rds of kids watch pornography while watching doing their homework and 34% of those will engage in sexual compulsory behavior.

232. **Statistic:** Apple and HP know that 40% of men of current college age students started looking at internet porn before the age of 10. Most of those males accessed that pornography on

devices created by HP and Apple.

233. **Statistic:** Apple and HP know that most pornography is being downloaded in America between 9am to 5pm. So it is a work place problem. Many companies predict that they are losing 90 minutes a day of productive work due to some form of internet sex. Looking at porn at work involves being sneaky. And it can get people fired, which would not occur if HP and Apple were more concerned with keeping their customers from forming the habit of escaping through porn.

ADDRESSING CONSIDERATIONS FOR CONGRESS, PARLAMENT, AND THE DEFENDANTS

234. **FREEDOM OF SPEECH ISSUES:** First of all, Apple and PC are not state actors so the first amendment does not even apply to them whatsoever. Apple and PC can unilaterally zap and block sights at will that are obviously associated with organized crime and terrorism. Apple and PC have a duty to comply with child obscenity laws and have failed to do so. Apple and Hewlett Packard are private companies, who have a duty to sell their products safely to consumed and to warn them about their dangers. They breached that duty as it applies to me and hundreds of millions of men. Apple and HP must not cannot sell products that unduly promote addiction and compulsory behavior that decreases the quality of an individuals life. To prove that I have lodged the instant products liability lawsuit for good cause.

235. **STATE ACTION:** It is possible that states could file lawsuits against device makers in the same way that they did against tobacco manufacturers, who caused states to have to pay astronomical amounts in addressing the adverse health impact of smoking. Here, the evidence shows that the states have had to shoulder the burden of that stem from the fall out of single parent homes and failed relationships that resulted from exposure to porn. The state could also

hold Apple and Hewlett Packard financially liable for the increasing expense in fighting cyber crimes, as Apple and Hewlett Packard products are being used to increase the demand for child pornography.

236. CONGRESS CAN PASS A LAW THAT REGULATES THE TIME, PLACE, AND MANNER OF SPEECH AND SHIFT THE BURDEN: The British Prime Minister got it right in his analysis regarding free speech. Just like Parliament can pass a law that regulates the time, place, and manner of speech on device makers regarding accessibility of pornography, our Federal and state legislatures can promulgate regulation that makes porn more inconvenient to access. Passing a uniform law that requires device makers to comply with child obscenity laws should be an obvious bipartisan matter because it is predicated on safe guarding children and their innocence. How could any Republican or Democrat be against that? Such a law passes Constitutional muster under the rational basis test.

237. BURDEN SHIFTING CONSISTENT WITH THE LONG STANDING POLICIES IN THE UNITED STATES AND THE FIRST AMENDMENT: I am demanding that device makers and the Federal and state legislature shift the burden onto those who want to see pornography to have to take the steps to remove the filter. The burden should not be on those who want to see pornography to have to go through the troubles of figuring out how to install filtering software to avoid it. Not everyone has a computer science degree and can figure out how to install filtering software to filter. I can imagine a Grand father, who makes an attempts to install filters to protect himself and his grandchildren, only to unknowingly failed to have effectively done so because he is not tech savvy, like the army of technicians employed by Apple and Hewlett Packard, who could install filters in their sleep. So, while the Grand father thinks his

grandkids are safe to use his computer, they might come to grandpa's house often just to access porn that they couldn't get at home on Grandpa's computer. More situations like that could be avoided. The spirit of the first amendment requires that the burden be on those who want to access pornography to have to take the steps to remove the filter. The scientific evidence demonstrates that pornography is a dangerous form of speech that warrants the burden to be on those who want to access it to take the extra steps to do so. Congress should regulate harmful speech. And Apple, Hewlett Packard, and experts like Patrick Carns, can attest first hand before a Congressional Hearing that Pornography is harmful speech.

238. ALL COMPULSORY ADDICTION IS LIMITED BY OPPORTUNITY: Apple and Hewlett Packard understand that all compulsory addiction activity is limited by opportunity. If there are fewer casinos, there are fewer gambling addicts. If internet porn is restricted there are fewer cases of sex addiction, inability to have intimacy, arousal addiction, intensity addiction, failed relationships, broken homes, and single mothers on welfare.

239. REASONABLE ATTEMPTS TO BLOCK, NOT PERFECT: To clarify, I think what the British Prime Minister is pushing for in the UK is that device makers install filters that make a "reasonable and good faith effort" to block pornography online. This is what I am demanding here. Not absolute perfection, but that Apple and PC be able to show that they have installed filters that make best efforts to block content that would otherwise violate obscenity laws. I am asking that Apple and HP make it harder for us guys to access porn so we can have an actual relationship with a non viral female. If the filters at least make it more difficult to access or stumble upon pornography, then its doing its job. Incidental encounters with porn should be a

thing of the past in light of the new scientific data on these matters and *res ipsa loquitur*.

240. HEAVY SIN TAX: Given the evidence of porn's harmful effect in the Witherspoon Institute report state and Federal Congress should impose a heavy sin tax on all hotels who make adult programming available to rent. This is matter should be treated no differently than the sin tax placed on tobacco manufacturers.

241. FAILURE TO WARN: The Defendants knew or should have known that online pornography was addicting or could cause arousal addiction. The Defendants failed to provide any warnings about the perils of pornography. I am a demanding that Apple and PC comply with the proposal offered by the British Prime Minister and provide its customers with express warnings that explains that some forms of online pornography might be illegal and those who view pornography on the web might "face consequences, such as losing their job, their family, and even access to their children if they continue." Why would Apple and Hewlett Packard even consider not issuing such a warning that they know to be true? To object to such an idea is proof that these device makers do not care about the well-being of their customers.

242. IF YOU WANT TO KILL A SNAKE, CUT ITS HEAD OFF: Genesis starts with a poetic story about a snake and an Apple in a garden that cause down fall of man kind. Apple is the head of this snake that is poisoning our youth and the this Court and the Federal Legislature should cut its head off if they give any push back to my demands. By alining ourselves with the UK on this, we will be cutting the head off a snake that is poisoning hundreds of millions of people and making the quality of their life much worse than it could be. All other devices makers make up part of that head as well, and to prevent the foreseeable perils of online pornography playing out, we need to cut the head off this snake by requiring filters to protect us from us through blanket

legislation.



243. Upon Information and belief, Apple and HP are aware that addiction does not require taking a chemical. Behavioral addiction taps into the same parts of the brain as a chemical addiction.

244. BEHAVIORAL ADDICTION: Apple and Hewlett Packard are aware of all the following:

Addiction is a brain disease. What we use to cope with stress can become addicting. Sex addiction is merely an attempt to avoid pain. An impulse becomes compulsive. And then you get to the place where you can't stop because the brain cannot go backwards. A behavioral addiction is the same thing as a chemical addiction. A behavioral addiction uses the same reward centers in the brain. The same chemicals, like dopamine, are at play. Sometimes somethings are just too

good for us. For example, one cannot be a recreational user of meth. Meth raises dopamine levels 111% in the brain. Thank goodness that meth is illegal and not readily accessible. Internet pornography is one of those things that is simply too good, raising dopamine levels 100%. We are wired to be sexual because its about survival of our species. Sex is sensate and presentation matters when it comes to intercourse. Presenting access to sex online is a lesser form of sex that exploits our biological make up in adverse ways causing a reconfiguration of nero-pathways in adverse restructuring. There is an adverse rewiring of the brain that takes place in watching internet pornography over time on Apple and Hewlett Packard devices. Although their might be a temporal perceived benefit, the long term accumulative effect is devastating to ones quality of life and our individual effectiveness in society. Like alcohol, cigarettes, and illegal drugs, porn has implications on the brain, which explains why we have child obscenity laws in place that Apple and HP have disregarded. Apple and PC know or should know that these things are true and yet they sell their products in an illegal fashion that sets their customers up to be injured.

245. GERIATRIC SEX ADDICTION: there are countless old men who are coming forth to seek help for sexual compulsive behavior due to how the sexual imagery online has impacted them. Given the accessibility, one can now access sexually vulgar images in two seconds that were nonexistent 10 years ago. Neropathways can change in the brain in males no matter what their age, but male adolescents are especially susceptible. This is why old people are seeking help for sexually compulsive behavior after they too were provoked by morbid curiosity presented by the easily accessibility of online pornography on devices that failed to provide any warnings of the dangers associated with their products. Apple and HP are placing males of all ages in a position to be injured by failing to warn and take proactive preventive measures. To say

that minors are the only one in need of protection is an agreement based on semantics. All males need better protection from online smut.



246. PORNOGRAPHY ONLINE IS HURTING WOMEN WHO WATCH IT TOO (See Lauren Dubinsky Story: http://www.huffingtonpost.com/lauren-dubinsky/porn-addiction_b_1686481.html). Upon information and belief, Apple and Hewlett Packard are aware of all of the following statements: Although it might be unusual for a woman to walk into a sex shop. Some women are taking more risk online. After all no one wants to be alone, and we all want to feel loved. Women are doing very male like things given the private nature and easily accessibility of the internet on Apple and HP devices. Because HP and Apple have failed to sell

their products on safe mode, many woman are putting themselves at risk by meeting people who are high risk. Further, many women think that to get a man they have to replicate what the girls are doing in the porn videos, which ultimately create crushing expectations and sets them up to develop stimulation/intensity additions of their own. Females were not designed to be treated like that women in porn videos. Many of them are being traumatized gradually, whether they know it or not. Women who are sucked into the vulgar world of internet pornography through their Apple and HP products are losing the capacity for intimacy and to form bonds themselves. Such women who have bought into the lie that porn is harmless end up alone often. Pornography is making it more difficult for women to experience intimacy in the same way that it is impacting men. A drop in oxytosen is occurring that hurts both sexes, as the capacity for bonding decreases. Here is Maria's story: [http:// www.youtube.com/watch?v=cQR4FF6qLBk](http://www.youtube.com/watch?v=cQR4FF6qLBk).



247. **I AM NOT ANTI-SEX:** I am pro-healthy sex in the context of convent between members of the opposite sex. I am an advocate for erotic sex between committed partners who have the capacity to be present, who have intimacy based sex, that reinforces their covenant connection and security with one another. Don't be confused, this lawsuit is about pushing culture in a position where people will have superior sex. Imposing unilateral filter requirements will serve

to further shift us back to a place where sex is beautiful again, where it is spiritual, where it is worth protecting, and where it reconfirms a relationship. Installing filters reinforces the notion that sex between members of the opposite sex in a covent relationship is prized and worth safeguarding. By joining the "joint task force" with the UK, our Nations send a message to the world that marriages and children are worth protecting, and that sex is special.

248. **SOMEONE'S DAUGHTER, SOMEONE'S FUTURE SPOUSE:** Females are meant to be treated with affection, tenderness, and due care by us men. Who among us could argue otherwise? I am begging the decision makers at Apple and HP to send that message to their own wife's and daughters by being responsive to this mission, by agreeing to sell their products on "safe mode," which could help shift our cultural prospective in a healthy and more rewarding direction. After all, the girl in the porn video is someone's daughter, some man's future wife; the man in the porn is someone's son, and some woman's future husband. The question begs what if that was your daughter or your future wife, or from the females prospective, your son or future husband? Those engaging in porn creation are hurting not only the viewer, but their future significant other in creating a permeant fix record of sex with someone they were not in a committed relationship with. Apple and HP are violating universal moral principle by encouraging their customers to watch this activity by being non-responsive to outrageous conditions. The future spouse of a former porn participant has grounds to sue Apple and Hewlett Packard for intentional infliction of emotional distress upon discovery of the pornographic content that Apple and HP are distributing every time they sell their devices. The installation of filters would absolve Hewlett Packard and Apple from liability to that end under the spirit of the

principles in the Second Restatement of Torts.

249. THAT WHICH IS MOST PRIVATE IS MOST PUBLIC: Millions of people suffer from online porn addiction. It is such a shame and guilt based condition that no one wants to deal with it. Millions of people deny it exist but there is a lot more science that is backing the realities of pornography addiction. People are now having sexual compulsory problems that never would have happened without access to the internet. But the internet is not the superseding problem. The device makers are to blame.





250. THE BENEFITS OF PRESET FILTERS OUTWEIGH THE COSTS: Rational decision making is predicated on the benefits outweighing the costs. If device makers and the legislature were to adopt this proposal, there could be some websites that are inadvertently blocked as a result of their policy. But the minor loss would not outweigh the major benefit in subscribing to the "joint task force" with the United Kingdom. These incidental losses would be without material consequence in light of the massive reward. Protecting families, decreasing sexually compulsive behavior, reducing the demand side of sex trafficking and child pornography are superior considerations to any possible downsides related to inadvertent loss of inconsequential information.

251. WELCOME TO THE LIST: Pornography is about trying to fill, escapism, and numbing out. This was what it is designed for in the same way that illegal drugs are. Its about escapism and experiencing a rush. If individuals who are over 18, who believe that they can manage the risk that stem from viewing porn want to "op in" and get the password to remove the porn filters, such individuals names should go on a list that could be subpoenaed and made publicly available. Those who "opt in" should have no objections to this because they have asserted that they do not believe in the perils of pornography by "opting in." They assume the risk. Any objections they might have should be overruled because by opting in their are either admitting that they have bad judgment or that porn is harmless, and so they should have nothing to worry about by having their name added to the list if that is their position. They cannot have it both ways. On the one hand they cannot say that pornography is harmless only to balk at having their name added to the list upon "opting in." If fear of having one's name added to the list is the same kind of deterrent that keeps guys from going to a porn shop to face to look the clerk in the face as they check out, then so be it. We'll all be better off if we help one another choose a better way of life through loving accountability.

252. HELL, FIRE, AND MISDIRECTION: While I am a huge proponent of the Bible, I did not file this lawsuit because I of the mindset of an angry "bible banger" standing on the street corner yelling: "repeat ye sinners or you gonna burn in hell for watchin' that there porn." That is not what this lawsuit is about. It is about the wrongful exploitation of the male biology, protecting adolescent minds, safeguarding marriages, giving us increased capacity to form bonds, decreasing the demand side for sex trafficking, reducing sex crime, improving the quality of life for all of us, diminishing the demand side of child pornography, shifting our collective

prospective towards innocence, depleting devastating shame, and creating an environment where sex can be at its best. This lawsuit is designed to encourage great sex, not inferior kinds promoted by Miley Cyrus and the misguided gay community, who are so misguided that they have attempted to recast their plight as one of equal protection, which is patently racist. This is a scientific based lawsuit that just happens to coincide with judeo-christian values because one set of truths tend to support and ratify another on its face. Online marketers are flooding the internet with provocative images that are specifically designed to induce males into the endless world of internet pornography, which tragically remains one click away at all times without filters. Its difficult these days for us males to access the internet and not be subjected to endless pop ups of provocative images that are crafted to tantalize and entice us males into a world of pornography that is silently addicting and concretely destructive.



IDENTIFYING THE TREND

253. **THE CLASSIC GROWING TREND AND SCENARIO:** I do not really understand how anyone could be shocked at my filing of the original lawsuit or this one. Here is the common progression of a typical scenario impacting millions of men. Lets say, a man is in a committed relationship with a woman. The man subsequently purchases Apple and Hewlett Packard computer exclusively for work purposes. The computers are sold to him without filters nor do they contain any warnings about the dangers of porn that can be access on the device. The man does not even know about the possibility of filters because he is not computer savvy. Additionally, the man believes that he has the will power to resist looking at porn, having never gone to a bricks and mortar porn store. The man and woman have intimacy based sex that reconfirms their commitment to one another. The man gets in the habit of having sex regularly and his body adjust to that as part of conditioning. One night the woman is not in the mood for sex, but the man is. The man gets on his computer in the privacy of his home office to do work. He is inundated with pop up ads featuring provocative looking woman with revealing parts that are reasonably calculated to trigger his sexual response systems causing him to feel distracted and turned on by what he sees. The man then accidentally keys in words that lead him to a porn site. Or perhaps the man is enticed to clicks on the ad inadvertently or in a moment of weakness that leads him into the endless abyss of pornography online that has at all times been just one click away. Obviously, the porn is more exciting than the boring/stressful work he was working on.

254. Upon seeing the porn, the man is overwhelmed with temptation. There are no

warnings presented by Apple or Hewlett Packard that the content he has come in contact with could damage him, his brain, or his marriage, but by that point it doesn't even matter because his sexual response system is triggered. He surreptitiously uses pornography for the self-gratification purpose for which it was created without letting his significant other know. The episode allows the man to escape and numb out in the same way that using illegal drugs would. There are no warnings that there is anything wrong with this practice; the man feels that he is not hurting anyone because he is just watching sexual content from afar between two consenting adults; so night after night the same cycle repeats as a stress reliever and escape mechanism, when the woman is sexually unavailable. A new kind of conditioning begins to take place unknowingly. The man becomes rewired for intensity, not intimacy. There is an element of secrecy, lust, and forbiddenness introduced into his sexual reward cycle. Eventually, the woman who he is in a relationship with cannot provide the same sexual stimulation that the millions of porn stars on multiple pages that are open on several pages on the computers can. Eventually, the man loses the capacity to emotionally connect with the woman because the porn has rewired him. His dopamine receptors have been sent into over drive, which has an adverse impact on delta fos b absorption. The relationship that was good for him and the woman falls apart. Children that would have been born never come into existence. Both individuals carry baggage with them into new relationships. The quality of everyone's life is grossly depleted. Society must then subsequently demand with the various forms of fall out that comes from a broken home that cost tax payers tremendously. Eventually, the excitement of porn decreases for the man after he turns to more extreme forms to experience the same rush. The man gets to the point that he decides that he would like to have porn type sex in real life. The man then begins dating promiscuous

girls who have bought into the philosophy and values promoted by Miley Cyrus, as portrayed here:" <http://www.mtv.com/videos/miley-cyrus/954189/wrecking-ball.jhtml#artist=2408193>.

The whole point of the new dating relationships is for this man to experience the fix of "hooking up" and "getting off." Emotional connection or bond formation have no part of this process. As time progresses, the man decides that it makes logical sense for him to just pay for escorts to save time and avoid emotional messes. Sex becomes tied to money, power, convenience, control, and on demand. The man, who was otherwise moral and law abiding, begins employing escorts through backpage.com that he accesses with ease on his Apple and HP. Women become objects to him. These illegal practices cause the man to become completely emotionally numb and incapable of forming meaningful connections, after conditioning himself to objectifying members of the opposite sex. The quality of the man's life becomes dismal compared to what it was or what it could have been. The man loses the ability to form meaningful bonds. Eventually, the man develops the need to up the excitement of perverse sex even more to maintain the same degree of the rush he was experiencing. To do so he begins flying to Taiwan, where he pays off the police to have sex with minors, who are held captive against their will by members of organized crime groups, who have abducted the victim by trick. The man wants to stop but finds that he cannot. The man is not alone in this pattern; there are hundreds of thousands on the same path. Our government, as well as others, then have to expend resources to combat these kinds of practices, which costs tax payers tremendous sums of resources to the point that the budget for sex crimes surpasses the budget for the war on drugs. The man wants to stop but feels that he cannot because he has been reprogrammed by pornography that was accessed on his Apple and HP. Meanwhile, he was never warned of the perils of online pornography by Hewlett Packard and

Apple. All of this could have likely been avoided if the Apple and Hewlett Packard had bothered to sell their devices with filters that would have prevented him from inadvertently coming in contact with porn online.

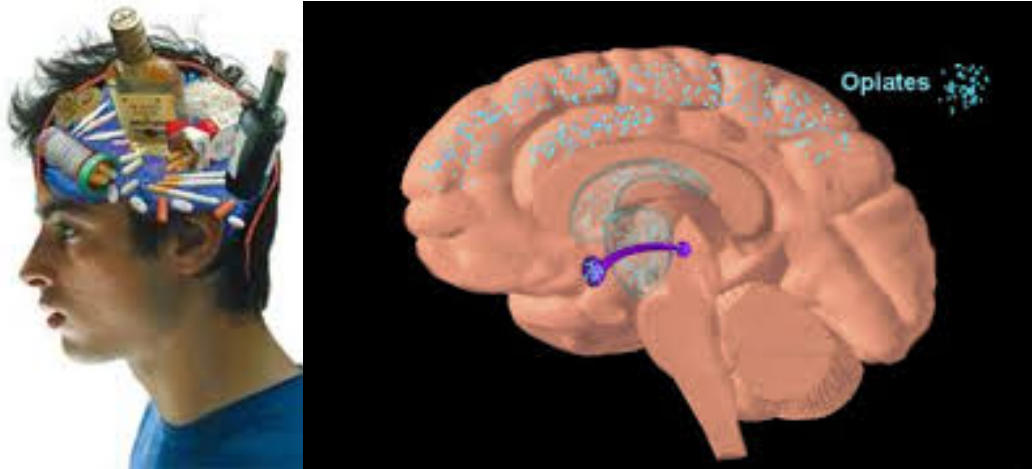
255. Fortunately, this scenario did not play out of myself like that. But it could have. Apple and HP's products were the delivery mechanism for destructive pornography that was not harmless. My way of recovery and rebooting was to take a proactive role in supporting the fight against sex trafficking on the extraction side. Additionally, this lawsuit is my way of recovering from the adverse impact of pornography and to expose the horrible danger it poses, if we are not more responsive to the realities of it. If the demand side of sex trafficking does not exist, then girls will not be sex trafficked. Guys who are engaging in sex trafficking, did not start out as sex criminals marked with morbid curiosity. The rampant online pornography that is made readily available on Apple and HP products has a lot to do with the increase in encouraging the demand side sex trafficking and production of child pornography.

256. **SIGNIFICANCE OF BACKLASH:** When I filed the original complaint against Apple, I included a vocal edit music video for Zedd's "Shave It" that included a message by Stanford Psychologist, Philip Zimbardo, called "The Demise of Guys." The video got thousands of views and hundreds of disparaging comments were made which ultimately even caused the video to be removed. Youtube said that the video violated the terms and conditions because it referenced porn.

257. That activity has significance here. Apple and PC should work with law enforcement to unilaterally zap/block sights from there computers like "Backpage.com" and

others that are clearly running prostitution circuits and encouraging the proliferation of organized crime. Apple and PC are not state actors. Apple and PC have no incentive not to work with the federal and state law enforcement to have such sights blocked. "If you want to kill a snake, you have to cut its head off." The burden of fighting and preventing sex crimes should not just fall on law enforcement. We all have a collective duty to oppose criminal misconduct if its within our power to. HP and Apple should make reasonable attempts to not allow their devices to be used to proliferate crimes against humanity. If backpage.com has a problem with this, then they can go manufacture their own computers, but neither Apple nor HP should allow their customers access to webpages like Backpages that are overt hubs of prostitution. I hope that one of the impacts of this litigation is that the doors between law enforcement and device makers will be further open for the benefit of us all.

258. Other sights like Backpages will pop up, and Apple and PC will not be able to block all porn and all websites that facilitate prostitution. But that does not relieve Apple and HP from the duty to having to attempted to block such sights when their devices leave the store. Just as Apple and HP send out software updates, Apple and HP can send up filtering updates. What neither I nor the British Prime Minister are demanding is perfection, but we want best efforts made in good faith to stop criminal activity by using common sense.



259. Ridicule, violently opposition, and then its accepted as self-evident: When someone proposes truth in this manner that I am, I expect three phases to occur: ridicule, violently opposition, and then its accepted as self-evident. Yet, I expect Apple, HP, all other device makers, and Congress to join the "joint task force" with the United Kingdom. I am being persecuted and prosecuted at every turn for filing this lawsuit, but that will not stop me from staying the course because I care about people and how porn is hurting them like it did me. The findings in the Witherspoon Report must be taken seriously and there needs to be affirmative responsiveness to this systemic problem.





260. **SPEAKING DIRECTLY TO APPLE:** I want to take a second to speak directly to Apple. Steve Jobs spoke of another side of the coin. "The gaps." Steve was a hippie in the best of ways. He said that a spirit can be put into a product, and that a person can "love a product." You do not want your products to be marked by a spirit of lust and evil, through the vicious assaults of predatory pornographers. To use Steve Job's language, I am here to help you nudge the vortex in the right direction. You have created the ultimate direct consumer distribution channel. This creates good and bad. You need to have a no-nonsense come to Jesus meeting about cutting out the bad. This goes for porn and copyright violations to protect song writers and authors. "Good artist don't steal, they copy" is not the motto to run your company by. You should not be stealing art and violating innocence. That is not progress it is evil. I am asking you to have good tastes and to focus on what is best about humanity.

PARTIES:

261. The Plaintiff was residing in Tennessee at the time of the injury at 9 Music Square South 247, Nashville, TN.

262. Apple Inc., formerly Apple Computer, Inc., is an American multinational corporation headquartered in Cupertino, California that designs, develops, and sells consumer electronics, computer software and personal computers. Its best-known hardware products are the Mac line of computers, the iPod music player, the iPhone smartphone, and the iPad tablet computer. Its software includes the OS X and iOS operating systems, the iTunes media browser, the Safari web browser, and the iLife and iWork creativity and production suites.

263. Hewlett Packard is a Corporation located at 3000 Hanover StreetPalo Alto, CA 94304-1185.

264. Eric Holder is over 18. He lives in Washington D.C. He can be served here: U.S. Department of Justice, 950 Pennsylvania Avenue, NW Washington, DC 20530-0001.

265. Mike O'Reilly works at the FCC. He is over 18 and lives in Washington D.C. He can be served at this address: Federal Communications Commission 445 12th Street, SW Washington, DC 20554.

JURISDICTION

266. Plaintiff brings his complaint under federal diversity jurisdiction, 28 U.S.C. 1332, as the parties are completely

diverse in citizenship and the amount in controversy exceeds the minimal jurisdictional limit of \$75,000.

267. This case arises under the United States Constitution and 42 U.S.C. Sections 1983 and 1988, as amended. This Court has jurisdiction in this matter pursuant to 28 U.S.C. Sections 1331 and

1343. The declaratory and injunctive relief sought is authorized by 28 U.S.C. Sections 2201 and 2202, 42 U.S.C. Section 1983 and Rule 57 of the Federal Rules of Civil Procedure. This action arose under 15 U.S.C. § 1051

268. This Court is an appropriate venue for this cause of action pursuant to 28 U.S.C. 1391(b)(1) and (b)(2).

ADDITIONAL FACTS:

269. Recently, the Plaintiff purchased an Apple Computer from the Apple Store. The Plaintiff purchased a Hewlett Packard from a store that sells them.

270. The computers came with preinstalled software that was intentionally designed to allow the Plaintiff to incorporate materials on the internet on the device.

271. Neither Apple nor HP gave any warning to the Plaintiff that he could be injured by using their products as intended.

272. Neither Apple nor Hewlett Packard provided the Plaintiff with any warning that he could encounter pornographic content in using their device that might decrease the quality of his life, cause addiction, and be harmful.

273. Apple and Hewlett Packard were aware when they sold the device to the Plaintiff that it was probable that he would encounter pornography online the internet could cause him to be adversely impacted.

274. Despite this knowledge, neither Apple nor Hewlett Packard failed to do anything to keep the Plaintiff from coming in contact with the content that would ultimately cause the quality of his life to diminish.

275. The Plaintiff has the right to be free from unknowingly developing an addiction as a result of using the Defendant's products.

276. The Plaintiff has the right to not have pornography decrease the quality of his life by accidentally accessing porn on Hewlett Packard and Apple devices.

277. Hewlett Packard and Apple were aware that the Plaintiff, along with all other normal healthy males, was sexually stimulated by visuals of illicit content that could be accessed in abundance on their products.

278. Hewlett Packard and Apple were aware that the Plaintiff's dopamine levels would be impacted by viewing pornography that was accessible on their devices.

280. Hewlett Packard and Apple knew that when pleasure pathways are used compulsively a downgrading occurs in a neurotransmitter called dopamine. HP and Apple were aware that porn that is accessible through their products has the potential to reset the pleasure thermostat in their customers' brains, as it did in the Plaintiff, as it destroyed his capacity for intimacy.

281. Hewlett Packard and Apple know that nearly all of their male customers are stimulated to by sight.

282. Apple and Hewlett Packard had a duty to warn the Plaintiff of the ways in which his mind

and body could be altered in using their products.

283. When Apple and Hewlett Packard sold the computer to the Plaintiff they knew that in using the software as intended that the Plaintiff could stumble upon pornographic content that would cause compulsory sexual behavior, arousal addiction, and decrease the Plaintiff's capability to experience intimacy by hijacking his dopamine receptors.

284. When Apple and Hewlett Packard sold their device to the Plaintiff, they did not card him to ask him if he was over 18, knowing that if the Plaintiff used the device as intended that he would come in contact with pornographic content that would cause them to be in violation of child obscenity laws, if he was a minor.

285. Apple and Hewlett Packard violated child obscenity laws by not verifying the Plaintiff's age before they sold him their product that became loaded with pornographic content, when being used as intended.

286. The Plaintiff has never smoked a cigarette in his life. He has never tried illegal drugs ever. The Plaintiff does not drink. The Plaintiff has no history of addiction whatsoever, until he purchased the Apple and HP products. The Plaintiff never went into a porn shop or purchased pornographic content before purchasing an Apple and Hewlett Packard device.

287. Neither Apple nor Hewlett Packard provided any warnings that accessing pornography through their devices could cause arousal addition, stimulation addition, or a decrease in the quality of the Plaintiff's life.

288. The Plaintiff stumbled into Porn on his Hewlett Packard device unintentionally,

when he type "cream pie" in a search engine because he was interested in making one.

289. The Plaintiff stumbled into porn on his Apple when he misspelled "Facebook.com."

290. The Plaintiff was relentless enticed to look at pornography by the constant pop ups that amounted to "hooks," as he worked on otherwise not as interesting subjects.

291. These pop ups were distracting and reasonably calculated to exploit the Plaintiff's attraction by sight him to click on the ad.

292. The purpose of porn is unquestionably vicarious sex.

293. Apple and Hewlett Packard know that the porn accessible on their product causes sexually compulsory behavior.

294. Apple and Hewlett Packard know that porn accessible on their product causes intensity addiction.

295. Upon stumbling into porn on his Hewlett Packard and Apple computer, the Plaintiff became hooked.

296. The Plaintiff discovered that he pornography was crafted so that viewers could escape reality and to numb pain through vicarious methodology.

297. This discovery entered into the reward cycle of the Plaintiff and hijacked his capacity for intimacy.

298. This escapism became addicting and caused the Plaintiff's quality of life to deteriorate.

299. As a result of observing porn on the Defendant's products, the Plaintiff's quality of life suffered.

300. The Plaintiff lost his wife and child as a result of his porn addiction that was developed because of Apple and Hewlett Packard products.

301. If the Apple and Hewlett Packard had filters in place, the Plaintiff never would have been injured in this capacity.

302. If Apple and Hewlett Packard had sold the Plaintiff his products on safe mode, he would have never opted to remove the filter, even if the option was available to do so.

303. If Apple and Hewlett Packard had made better attempts to block pornography the Plaintiff would not have stumbled upon it by accident or been enticed to investigate it.

304. Eventually, the Plaintiff became to not just want to look at porn but to participate in porn scenarios in real life. He began having dates with countless beautiful girls, just hoping to have intensity based sex because that is what porn conditioned him to desire.

305. Since the Plaintiff was classically conditioned by pornography to be conditioned to desire to get the fix of just getting off with an attractive member of the opposite sex, the Plaintiff began to investigate ways to skip the dating process. Because doing so was the logical end result from the overall message of porn.

306. The Plaintiff discovered backpages.com. Backpages.com's adult escort section took up the slack, when Craig's list closed down its adult section.

307. Backpages.com adult section is unquestionably a hub for criminal prostitution that provides escorts.

308. There are women of all age, race, and nationality who make themselves available for sex for pay in every major metropolitan area in the world. There are no emotional strings attached to these escorts.

309. Accessible porn lead him to the Plaintiff to the very door step of the dark world of criminalized sex on demand made available on Apple and Hewlett Packard products with absolute impunity.

310. As a man, it was easy for the Plaintiff to see how online pornography could proliferate the demand side of sex trafficking and deteriorate into darker forms of depravity.

311. The Plaintiff is an attorney and is not a scoff law. He is a man of honor that prides himself on integrity, and yet, he was nearly completely undone and crippled by the potency of the "internet porn effect."

312. Instead of opening the door that back pages presents the Plaintiff, chose to join causes that fight sex trafficking, to expose this problem.

313. Filing this lawsuit demanding that device makers heed the call to the British Prime Minister to help us guys protect ourselves from ourselves is a form of recovery to reverse the process that Apple and Hewlett Packard products started.

314. If the opportunity for voyeristic sex was greater limited by device makers the quality of the

Plaintiff's life would be dramatically improved.

315. If this is true for the Plaintiff, it is the case for millions of other guys, who do not have the courage or the skill set to do what the Plaintiff is doing here.

CAUSES OF ACTION
FRAUD, including FRAUDULENT MISREPRESENTATION, FRAUDULENT
CONCEALMENT, FRAUD AND DECEIT, MISREPRESENTATION BY OMISSION;
CONSTRUCTIVE FRAUD

316. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

317. The Apple and Hewlett Packard intentionally misrepresented to the Plaintiff a material fact in regards to the dangers of their products in so far as they allowed him to come in contact with content on their machines that damaged him. The Defendants did not tell him anything about their agency relationship with predatory pornographers. They did not mention anything at all about their knowledge of the highly addictive nature of the porn they foresaw that he was be exposed to as their agents employed a series of scams and tricks to force him into interacting with their highly addictive content.

318. Because the Plaintiff reasonably relied on the misrepresentation that use of the Mac Book and HP computer was safe, the Plaintiff continued his use of safari and suffered severe loss of enjoyment of life, loss of his capacity to earn a living, medical expenses, physical and mental pain and suffering.

319. Neither Apple nor Hewlett Packard did anything to safeguard the Plaintiff from using their devices in a way that foreseeably exposed him to content that was damaging.

320. Apple and Hewlett Packard held their products out as being safe when the Plaintiff purchased the device, when they knew that the Plaintiff would come in contact with addicting content through the normal use of their device.

321. Apple and Hewlett Packard were aware of the abundance of obscene pornography that could be access through the normal use of their devices. Yet, neither Apple nor HP did anything to prevent the Plaintiff from coming in contact with the damaging content.

322. The Defendant engaged in fraud by not telling the Plaintiff about their relationship with predatory pornographers. They Defendants did not tell him about how using their products could inflict him with addiction and cause him to form a bond with their product.

323. The Defendants were well aware of the tactics of predatory pornographers to cause their customers to interact with highly addicting porn that the Defendants made readily available. The Defendants knew that these tactics were causing addiction and did nothing about it because it is in their best interest that their customers develop porn addictions, forming chemically dependent bonds with their products.

324. The Defendants ratified the actions of the predatory pornographers and encouraged it at all times, while withholding vital information to the customs and leaving them exposed to an ambush on their senses and to the highjacking of their capacity to experience intimacy, leaving their victims desensitized, wrecked, and addicted.

COUNT TWO PRODUCTS LIABILITY (DEFECTIVE DESIGN; FAILURE TO WARN)

325. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. Plaintiffs aver that Apple and Hewlett

Packard, by processing, manufacturing or furnishing electronic devices that allowed unfiltered access to addicting content that was a significant and substantial health risk to the public at large, and more particular, to the Plaintiff, violated the Tennessee Products Liability Act of 1978, T.C.A. § 29-28-101, et seq. T.C.A. § 29-28-105 provides that manufacturers, processors, or finishers who provide products which are unreasonably dangerous are held strictly liable for any injury to a person caused by that product.

326. Apple and Hewlett Packard knowingly sold devices that gave their customers, to include the Plaintiff, access to harmful content that they knew could cause addiction and could cause the quality of their customers lives to diminish. Apple and Hewlett Packard could have taken a few easy steps to protect the Plaintiff from coming in contact with unwanted materials by selling the product on "safe mode" but failed to do so because they are either irresponsible, greedy, indifferent to the welfare of their customers or all of the above. (If Apple can install safari software to connect to the internet, it can install filtering software to protect the customer from unwillingly coming into content that causes damage from the normal use of their products).

327. As manufacturer, processor, or furnisher of a device that allowed the Plaintiff to access addicting content without warning, Apple and Hewlett Packard processed a finished product which was unreasonably dangerous or defective pursuant to T.C.A. § 29-28-102(2)(8) inasmuch as the danger of stumbling upon pornography that causes addiction was not one that would have been contemplated by the ordinary consumer and inasmuch, as the content accessible through the use of the computers proved it to be defective or in a dangerous condition that it would not have been furnished to the public by a reasonable prudent manufacturer, processor, or furnisher.

328. Apple and Hewlett Packard sold computers to the consumer with software to access the internet without any filters to block addicting pornography. They failed to provide the Plaintiff with any warning that viewing pornography online could be psychologically harmful and addicting, and lead to a decrease quality of life.

118. The devices were in an unsafe condition without having installed filtering porn software or control settings that block porn at the time it left the manufacturing plants.

329. The Plaintiff avers that the injuries suffered were a direct and proximate result of the unreasonably dangerous or defective condition of the products created by Apple and Hewlett Packard in the absence of pre-set filters upon sale. Apple and Hewlett Packard knew the damaging and addicting qualities of pornography and are liable and answerable to the Plaintiff for the injuries suffered.

**COUNT (STRICT LIABILITY) PRODUCTS LIABILITY (DEFECTIVE DESIGN;
FAILURE TO WARN)**

T.C.A. § 29-28-101 et seq.

330. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

331. Design defects occur where the product design is inherently dangerous or useless (and hence defective) no matter how carefully manufactured; the product failed to satisfy ordinary consumer expectations as to what constitutes a safe product.

332. The risks of the product outweigh its benefits.

333. Defendant, at all times material to this action, designed, manufactured, distributed and/or

sold the dangerous laptop computers and phones and placed such product into the market.

343. The defective devices designed, manufactured, distributed, and/or sold by Defendant are defective and unreasonably dangerous.

344. The defective laptops and phones reached Plaintiff without substantial change in the condition in which the products were designed, manufactured, distributed, and/or sold by Defendant.

345. Defendant owed a duty of care to Plaintiff to manufacture, distribute and sell laptops, computers, and phones that were free from defects and fit for their intended purposes

346. Defendant breached this duty to Plaintiff by failing to sell its laptops, computers, and phones that were free from defects and unfit for their intended purposes.

347. Plaintiff used the laptops, computers, and phones in the manner that was intended and expected by Defendant.

348. The defect in the laptops, computers, and phones was the direct and proximate cause of the injury and damages suffered by Plaintiff.

NEGLIGENCE PRODUCTS LIABILITY (DEFECTIVE DESIGN; FAILURE TO WARN)

349. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

350. Defendant owed a duty to Plaintiff to design, manufacture, distribute and/or sell laptops, computers, and phones that were safe and to warn Plaintiff of any defects in the laptops, computers, and phones.

351. Defendant breached its duty to Plaintiff by designing, manufacturing, distributing and/or selling laptops, computers, and phones that were defective, and by failing to warn them of such defect. The Defendants' conduct fell below the standard of care.

352. Defendant's breach caused Plaintiff to suffer damages.

PUNITIVE DAMAGES Tenn. Code Ann. § 29-39-104

353. Punitive damages should be award under all available legal theories for each and every violation. Punitive damages should be awarded under Tenn. Code Ann. § 29-39-104. The defendants acted maliciously, intentionally, fraudulently or recklessly.

COUNT BREACH OF IMPLIED WARRANTIES: 47-2-314

354. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. .

(1) Unless excluded or modified (§ 47-2-316), a warranty that the goods shall be merchantable is implied in a contract for their sale if the seller is a merchant with respect to goods of that kind. (2) Goods to be merchantable must be at least such as: (a) pass without objection in the trade under the contract description; and (b) in the case of fungible goods, are of fair average quality within the description; and (c) are fit for the ordinary purposes for which such goods are used; and (d) run, within the variations permitted by the agreement, of even kind, quality and quantity within each unit and among all units involved; and (e) are adequately contained, packaged, and labeled as the agreement may require; and (f) conform to the promises or affirmations of fact made on the container or label if any. (3) Unless excluded or modified (§ 47-2-316) other implied warranties may arise from course of dealing or usage of trade.

355. The Defendants breached the implied warranty of merchantability in the sale of the phones, laptop, and computers by selling in the condition it was in. The Defendants maliciously exposed the Plaintiff to obscene and highly addictive pornographic content without, knowing that the material was highly addictive. The Defendants designed their products in such a fashion to enable this to occur, knowing that their actions would harm the Plaintiff for their personal financial benefit. Given their agency relationship with predatory pornographers and their knowledge of the scams they would impose on the Plaintiff to become unnaturally bonded to their products, the Defendants calculating agenda was the direct and proximate result of the damages sustained by the Plaintiff.

356. No where on the packaging was their any indication that the products contained the ability to inflict the Plaintiff with unwanted addictions.

357. The goods sold to the Plaintiff were unfit for the ordinary purposes for which such goods are used. The Plaintiff wanted to use the product for business, not sex.

COUNT UNFAIR AND DECEPTIVE TRADE PRACTICES PURSUIT TO TCA §§
47-18-101 et. seq. CONSUMER PROTECTION ACT

358. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

359. T.C.A. § 47-18-109(a)(1) creates a private cause of action for any person who suffers a loss

as a result of one of the listed “unfair or deceptive acts or practices” found in T.C.A. § 47-18-104(b). T.C.A. § 47-18-109(a)(1) provides as follows: (a)(1) Any person who suffers an ascertainable loss of money or property, real, personal, or mixed, or any other article, commodity, or thing of value wherever situated, as a result of the use or employment by another person of an unfair or deceptive act or practice described in § 47-18-104(b) and declared to be unlawful by this part, may bring an action individually to recover actual damages.

360. The Defendants engaged in deceptive trade practices by leading the Plaintiff to believe that their products were safe. The Defendants made no mention whatsoever that they were exposing the Plaintiff to addicting content through their pornographic agents. The Defendants commissions and invited their agents to cause the Plaintiff to interact with their pornographic content.

361. In doing so the Plaintiff developed codependence and attachment to the Plaintiff's products. This was as the Defendants wanted. As a result of this deceptive plan, the Plaintiff suffered the loss of money, property, and other things, as a direct result of the Defendants bad faith, deceptive practices, false advertising and fraud.

COUNT THREE RES IPSA LOQUITUR RELATING TO PERSONAL INJURY

362. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. Apple and Hewlett Packard have a "duty" to act "reasonably."

363. It is unreasonable for Apple and Hewlett Packard to place a burden on their customers who

do not want inadvertently come in contact with pornography to have the burden to instal filtering software.

364. Apple and Hewlett Packard are well aware of the amount of pornography online and how internet marketing companies are attempting to entice males to get hooked on porn. (See the Witherspoon Institute Report).

365. It used to be the case that it took time, money, and expense to view pornography. Now it takes time money and expense to avoid it on the Defendant's device, which is an unreasonable and unjust circumstance created by Apple and Hewlett Packard. Something about that is inherently wrong on its face.

366. Apple and Hewlett Packard knew or should have known that pornography was harmful speech, when they sold their products to the Plaintiff. Apple and HP placed an undue burden on the Plaintiff.

367. Apple and Hewlett Packard knew that Plaintiff is attached to beautiful women by sight, as all normal healthy males are.

368. Requiring those who want to avoid seeing pornography to have the burden to take steps to install filters is unreasonable.

369. Apple and Hewlett Packard sell their products to their customers with software that allows them to connect to the internet and expects that they will, as part of the normal use of their products.

370. Apple and Hewlett Packard knew that the Plaintiff could stumble on upon content that had addicting qualities and could produce sexually compulsive behavior that would diminish the quality of the Plaintiff's life.

371. The defendants knew that it would be an easy and inexpensive fix for them to sell their products on safe mode, which would filter out illicit pornographic content.

372. If Apple and Hewlett Packard have sold their products to Plaintiff in safe mode, he would not have stumbled upon pornography and become injured.

373. Neither Apple nor HP warned the Plaintiff of the harmful impact that porn could have on his life if he was to stumble upon it through the normal use of the device they sold him.

374. Apple and HP have a duty to honor child obscenity laws and their is something inherently wrong with allowing minors to leave their stores with their products without filters that block obscene content.

RES IPSA LOQUITUR RELATING TO INJURY OF WASTE

375. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

376. The Plaintiff is a tax payer in a special category and class under Title 38.

377. Presumably some of the money that the Plaintiff pays goes to law enforcement to include units that fight cyber crime.

378. The budgets for law enforcement relating to cyber crimes has increased in recent years.

379. Wasting tax pay dollars is an injury to tax payers, like the Plaintiff.

380. Apple and Hewlett Packard have a duty to act reasonably. Yet, Apple and Hewlett Packard have breached this duty by selling devices to minors in violation of child obscenity laws. Apple and Hewlett Packard have breached their duty to act reasonably knowing that their devices are being used in a manner that encourages organized crime and criminal activity to include prostitution. Apple and Hewlett Packard have not acted reasonably knowing that their products are being used to encourage sex crimes through the unwarranted objectification of women.

381. Apple and Hewlett Packard breached a duty to tax payers by not selling their devices with filters, which has increased the demand side of sex trafficking, child pornography, and other forms of criminal sexual misconduct.

382. Fewer of the taxes paid by the Plaintiff would go towards fighting sex crimes, if Apple and Hewlett Packard honored its duty to act reasonably by selling its devices with filters in accordance with state law.

383. Accordingly, the Plaintiff has been directly injured by the Defendants breach of their duty in this regard and has standing under this claim as a tax payer.

COUNT FOUR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

384. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. Apple and Hewlett Packard knew or should have known that all male customers, which includes the Plaintiff, are chemically and biologically designed to be attracted to females by sight.

385. Apple and Hewlett Packard knew or should have know that the Plaintiff could accidentally stumble upon pornographic images that would hook him into the online porn world to the point of causing arousal addiction.

386. Apple and Hewlett Packard knew or should have know that the impact of such a condition could destroy the Plaintiff's family, quality of life, income producing capability, and so forth.

387. Apple and Hewlett Packard could have easily sold its devise with filtering software installed which required the Plaintiff to take an additional step to acquire a password that was specifically designed to have the filter removed with little burden to itself.

388. The foreseeable and proximate cause of the injuries inflicted on the Plaintiff directly stem from Apple and Hewlett Packard 's failure to act.

389. Apple and Hewlett Packard were well aware of the of damaging qualities of pornography, but did not provide any warnings to the Plaintiff of how the content assessable on their products could cause him injury is conduct that should not be tolerated by civilized society.

390. The burden placed on Apple and Hewlett Packard to make the adjustments to keep their products from harming their customers is low.

TORTIOUS INTERFERENCE

391. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

392. The Plaintiff had a marital contract at the time of sale.

393. The manner under which the Defendants sold their products to the Plaintiff interfered with this contract, causing breach.

394. The fact that the Plaintiff was married at the time of the sale was known to the Defendants. The Plaintiff wore a wedding band, when he bought the products. The Plaintiff's marriage license is part of the public record, giving the Defendants constructive knowledge of his wedding.

395. The Defendants were in a place to know that they would be distributing addicting content to the Plaintiff that would put his marriage in jeopardy. They had a secret agency relationship with predatory pornographers. As Steve Jobs has repeatedly said, "content is superior to programming." These defendants were all about the distribution of content, especially addicting content that they knew would pose a threat the Plaintiffs' marriage. The Defendants did nothing to warn him. They did not do anything to prevent him from interacting with their pornography they knew they were subjecting him to.

396. The Defendants' breach was the proximate cause that injured the Plaintiff due to the Defendant's negligence and reckless disregard for his well being.

COUNT FIVE NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

397. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

398. Defendants owed the Plaintiff a duty of care by selling him a device that would not cause

him mental, physical, and emotional injuries and diminish the quality of his life.

399. The Defendants breached their duty of care by negligently, accidentally or recklessly creating a punishing, hazardous and unduly harsh living environment, by negligently, accidentally or recklessly failing to safeguard the mental and physical health and well-being of Plaintiff by selling him a device that was not set on "safe mode," and by negligently, accidentally or recklessly failing to provide plaintiff with notice of the dangers of pornography that was accessible through the device.

400. Apple and Hewlett Packard 's breach of this duty directly and proximately caused the Plaintiff to suffer damages, mental and emotional, including fear, humiliation, depression, severe physical, thrill seeking, and emotional distress in causing the quality of his life to diminish.

401. As a result, the Plaintiff has been damaged in an amount to be determined at trial.

COUNT SIX OUTRAGEOUS CONDUCT

402. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

403. The Defendants false advertising, concert effort with predatory pornographers, and knowledge of the dangers that they were subjecting the Plaintiff to was so heinous and beyond the standards of civilized decency or utterly intolerable in a civilized society. The actions were so heinous that a reasonable person would declare "outrageous!" upon the discovery of this concerted plan. The conduct was extreme in all regards. There was a pattern of conduct, not an isolated incident as the Defendants carried out this fraudulent plan on millions of customers

repeatedly.

404. The Defendant owed the Plaintiff a fiduciary duty under these sets of facts and breached that duty. "Outrageous!"

COUNT EIGHT CIVIL CONSPIRACY

405. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

At all times relevant to the factual allegations in this complaint, the Defendants conspired and knowingly acted in concert with the intent and understanding that they were subjecting the Plaintiff to unwanted pornography addiction, that they were aware of the dangerous hazard and deliberately mislead the Plaintiff in a scam to maximize profits, that they had set out to make him chemically dependent on their products, that they were acting in concert with predatory pornographers to invade the Plaintiff's privacy for their own personal benefit. As such, the unlawful tortious acts of all of the Defendants undertaken in the course of, and in furtherance of this civil conspiracy are imputed to each other and each Defendant is civil liable for all of the unlawful and tortious misconduct as if they actually, physically committed or ordered the commission of such unlawful, tortious acts themselves.

COUNT NINE BREACH OF THE DUTY OF GOOD FAITH AND FAIR DEALING

406. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

407. A special relationship existed between Apple, Hewlett-Packard, and the Plaintiff. The

Defendants were selling advance technological machinery and had received special training and certifications that the Plaintiff had not. The Plaintiff was fraudulently induced to enter into a contract with the Defendants through their false advertising initiatives. The Plaintiff was never warned of the defects in the Defendants products. The Defendants did not tell him about the addictive qualities of the pornography that they knew he would be subjected to, given their secretive relationship with predatory pornographic content providers. The aggrieving part was in a superior and entrusted position. The Defendants engaged in grievous and perfidious misconduct in extreme bad faith in breaching the contract in unconscionable ways from their benefit. The Plaintiff suffered personal, financial, and emotional injuries as a result and the quality of his life greatly diminished.

COUNT FEDERAL VIOLATION OF SECTION 15 U.S.C. §§ 1051 ET SEQ: LANHAM
ACT FOR FALSE ADVERTISING

408. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

409. The Lanham Act establishes a federal cause of action for, among other things, false advertising:

(a)(1) Any person who, on or in connection with any goods or services, or any container for goods, uses in commerce any word, term, name, symbol, or device, or any combination thereof, or any false designation of origin, false or misleading description of fact, or false or misleading representation of fact, which

(B) in commercial advertising or promotion, misrepresents the nature, characteristics, qualities, or geographic origin of his or her or another person's goods, services, or commercial activities, shall be liable in a civil action by any person who believes that he or she is or is likely to be damaged by such act.

The plain language of the statute permits any person likely to be damaged to assert a claim based on a false or misleading statement of fact about a product, service, or commercial activity.

(1) the defendant made a false or misleading statement of fact in a commercial advertisement about a product;

(2) the statement either deceived and had the capacity to deceive a substantial segment of potential consumers to include the Plaintiff.

(3) the deception is material, in that it is likely to influence the consumer's purchasing decision;

(4) the product is in interstatecommerce; and

(5) the plaintiff has been injured as a result of the statement. Other consumers will be injured as a result of the Defendants false advertising.

FALSE ADVERTISING (Tennessee Common Law)

410. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

411. The Defendant engaged in unfair, deceptive, untrue, and misleading advertising.

412. The Plaintiff suffered injury in fact and lost money and property.

JOINT AND SEVERALLY LIABLE:

413. The Defendants are jointly and severally liable for the acts and omissions alleged in this complaint.

FALSE ADVERTISING (Tennessee Common Law)

414. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

415. The Defendant engaged in unfair, deceptive, untrue, and misleading advertising.

416. The Plaintiff suffered injury in fact and lost money and property.

JOINT AND SEVERALLY LIABLE:

417. The Defendants are jointly and severally liable for the acts and omissions alleged in this complaint.

**COUNT UNDER 42 USC 1983 PURSUANT TO THE 5th AMENDMENT RELATING TO
THE VIOLATIONS OF THE FCC**

418. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

419. Mike O'Reilly at the FCC has put in his position in part based on his promises to crack down on the kind of computer porn that Apple and Hewlett-Packard are inflicting on our nation. He is well aware that they are in violation of the FCC guileless and engaging in a host of fraudulent practices that are reeking havoc in the United States and around the globe. Their activity poses a threat to traditional marriages and children. The FCC must be responsive to this

problem. Had the FCC bothered to be responsive years ago, I would not have lost my family. The FCC's non responsiveness constituted a constructive take of property and liberty that violated my Constitutional rights under the 5th Amendment.

420. I complained about these matters to the FCC. I have tried to contact Mike O'Reilly repeatedly. My demands were ignored, and I can promise you one thing: I am not the guy to ignore. I want Mike O'Reilly to do his job and make all device makers comply with the demands set forth in this action to include these nefarious Defendants. I want to see a joint task force firmly established between the United Kingdom and the United States as demanded by the British Prime Minister.

421. I want the FCC to institute a system of actual accountability as soon as possible. This is not a matter of politics. This is a matter of protecting women and children, reshaping societies viewing of sex in a positive way.

COUNT UNDER 42 USC 1983 PURSUANT TO THE 5th AMENDMENT RELATING TO
THE VIOLATIONS OF THE FTC

422. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

423. Edith Ramirez is the Chairman of the FTC. The FTC is well aware of the bad faith and fraudulent business tactics of Apple. (see the latest iTunes settlement).

424. The FTC for years has known that device makers are violating the law in the ways laid out

in this complaint. I complained to the FTC but my complaints were ignored. I am a person with a voice, and if I have something to say, I expect it to be heard loud and clear. I want the FTC to be responsive to this complaint. I want to see a joint task force formed with the United Kingdom on this matter. This fight is about our world collective. Help us missionaries inflict a blow to Sex Trafficking and child pornography. Help us prevent incarcerations and victimization. As a woman yourself, I am asking that you help me guard against the objectification of women in this nation. I am imploring you to exercise your powers to crack down on device makers. They have always had the technology to make porn harder to access but have refused to do so because they are incredibly greedy and self-absorbed.

425. If the FTC had been on top this matter from the beginning, I would not have been injured as I was. I complained to the FTC, they did not respond to my complaint. The FTC's lack of responsiveness to the problems created by device makers is completely outrageous. Being old and out of touch is not a valid excuse in allowing them to trample over our laws, placing women and children at risk. Because of the FTC's lack of initiative I suffered an injury that of my Constitutional rights as the Federal Government took things that were precious to me without due process of law. My 5th Amendment right has been violated.

COUNT UNDER 42 USC 1983 PURSUANT TO THE 14TH AMENDMENT OF THE
CONSTITUTION OF THE UNITED STATES

426. The Plaintiff realleges and incorporates by reference each and every allegation contained in

the preceding paragraphs as if set forth fully herein.

427. Eric Holder is the Attorney General of the United States.

429. Mr. Holder, with President Obama, have launched an initiative to discriminate against traditional marriages to get same sex marriage passed by the the states and recognized by the Federal Government. Eric Holder is bent on discriminating against Christians.

430. Eric Holder knows that Same Sex marriage is not an equally protection matter that arises under the 14th Amendment but has set out to misclassify a particular group of sex addicts who prefer having sex with members of the same sex as a result of classic conditioning. Eric Holder knows that in trying to cast homosexuals as a protectable class is a flagrantly racist move to make. Eric Holder makes this class distinction comparing their fowl behavior as a class that is on par with something as insignificant as skin color. Eric Holder pushes his same sex marriage agenda on the backs of slaves, when sexual orientation is not a comparable class to a class based on skin color. Eric Holder and the Presidents, outrageous agenda offends the spirit of the civil rights act of 1964 and makes a mockery out of Dr. Martin Luther King and all of the other evangelics of all colors who fought to end segregation. Eric Holder and the Presidents reckless abuse of process through the Courts to further same sex marriage agenda is an act of willful and inexcusable discrimination against all married persons living in the United States and around the world. To compare something as so apparently unequal as couples in traditional marriage those unwise enough to have deceived themselves into entering into same sex relations is a flagrantly unethical act that directly violates the rules of professional responsibility that Eric Holder is subjected to. Just because Eric Holder believes that he can selective pick and choose which laws to enforce and which ones he can ignore, does not mean that he has the right to pick and choose,

which ethics laws he can break that attach to his office. No, I think not. This man, is entirely incompetent and grossly incapable of executing the duties of his office. He is a scoundrel and a bigot, who does not understand the general tenets of his post and must be removed to protect the interest of the United States.

431. Eric Holder refused to defend DOMA in the Windsor case and pushed the matter to the United States Supreme Court, despite the lack of standing because he has conspired with the President to persecute Christians and traditional marriage through overt discriminatory tactics. Through that effort Eric Holder and his wingman, the President, hijacked democracy through the Courts.

432. Eric Holder is fully aware that Apple's and Hewlett-Packard's concerted efforts to expose their customers to pornography. Eric Holder is aware that they are in bed with pornographers and have aligned themselves with pornographers. Eric Holder is fully aware that these Defendants are the world largest distributor of pornography. Eric Holder is fully aware that the content they distribute is highly addictive and has the same impact on a viewers brain and reward cycle as using cocaine.

433. Eric Holder is fully aware that Apple and Hewlett-Packard are violating obscenity laws in every state by distributing pornography to minors. Yet, he is not been responsive whatsoever.

434. Eric Holder is aware of Apple and Hewlett-Packard's predatory pornographer's efforts to scam, trick, and force their customers to interact with highly addictive computer porn, distributed and ratified by Apple and Hewlett-Packard.

435. Eric Holder is aware that it his duty to enforce this law: 18 U.S.C. § 2252: Federal law prohibits the production, distribution, reception, and possession of an image of child

pornography using or affecting any means or facility of interstate or foreign commerce (See 18 U.S.C. § 2251; 18 U.S.C. § 2252; 18 U.S.C. § 2252A).

Erich Holder is aware that Apple and Hewlett-Packard have mislead the public that their devices are pornography free through fraud and false advertisement.

436. Erich Holder knows that Apple and Hewlett-Packard are in violation of 18 U.S.C. § 2252 by distributing child pornography and other forms of illegal pornography to minors and adults.

437. Eric Holder has not been responsive to these criminal violations

438. Erich Holder is aware that Apple and Hewlett-Packard have made large financial contributions to the Obama administration.

439. Eric Holder is knows that Apple and Hewlett-Packard are proponents of homosexual marriages and proponents of all kinds of sex addiction because sex addicts buy their products to have unlimited access to the worlds largest distribution of porn.

440. Erich Holder knows that the dangerous and defective manner that Apple sells their products in has caused the demand side of sex trafficking to dramatically increase, along with child pornography production.

441. Erich Holder has not prosecuted a single obscenity case since President Obama took office.

442. Erich Holder knew that Apple and Hewlett-Packard were not complying with the federal laws when they sold me their dangerous product and subjected me to predatory pornographers who injured me.

443. Unlike Homosexuals, Erich Holder knows that the religious groups are a protected class for purposes of the 14th Amendment to the United States Constitution. This includes Christians, Jews, Muslims, and so forth, living in the United States.

444. Eric Holder is fully aware that interacting with pornography violates the religious laws in nearly every religion known to mankind. Eric Holder is fully aware of Apple and Hewlett-Packards collaboration with predatory pornographers to subject their customers to interacting with highly addictive pornographic content that violations their core religious values. Despite this direct knowledge, Eric Holder has failed to do a single thing to prevent this outrageous tactics by the Defendants because it is his goal along with the Presidents to stamp out religion, and reduce our nation to a socialist-nanny state of atheistic tendencies.

445. By being inexcusable and unethically non responsive to the scams and ploys of Apple and Hewlett-Packard, Eric Holder, himself has discriminated against religion for purposes of the 14th and 5th Amendments of the United States Constitution. This discrimination fell upon me and was nothing less than a gross and flagrant form of persecution-in-kind of persons of the religious faith held by nearly every single on of our founding fathers. This man must be held accountable. This is not Iran, Mr. Attorney General. This is the United States of America. Persecutions of people of religious faith in this Country is flagrantly intolerable. If Mr. Holder would like to be a more direct participant in the persecutions of Christians, my recommendation would be that this Honorable Court order him to become the Attorney General in Egypt. The fact that I am a former combat veteran of Operation Iraqi Freedom, makes Mr. Holder's discrimination particularly objectionable and he must be brought to account for his role in the molestation of the rule of law in the United States.

COUNT 12 VIOLATION UNDER 42 USC 1983 UNDER THE 5th AMENDMENT DUE
PROCESS UNLAWFUL TAKING

446. The Plaintiff realleges and incorporates by reference each and every allegation contained in

the preceding paragraphs as if set forth fully herein.

447. Eric Holder is the Attorney General of the United States. Eric Holder selectively enforces the laws of the United States and has engaged in fraud, waste, mismanagement, and abuse.

448. Mr. Holder is not above the law. He is subject to accountability by office of the Inspector General and under the laws of the United States.

449. Mr. Holder, with President Obama, have launched an initiative to discriminate against traditional marriages to get same sex marriage passed by the the states and recognized by the Federal Government.

450. Mr. Holder knows that Same Sex marriage is not an equally protection matter that arises under the 14th Amendment but has set out to misclassify a particular group of sex addicts who prefer having sex with members of the same sex as a result of classic conditioning.

451. Mr. Holder refused to defend DOMA in the Windsor case and pushed the matter to the United States Supreme Court, despite the lack of standing because he has conspired with the President to persecute Christians and traditional marriage through overt discriminatory tactics.

452. Eric Holder is fully aware that Apple's and Hewlett-Packard's concerted efforts to expose their customers to pornography. Mr. Holder is aware that they are in bed with pornographers and have aligned themselves with pornographers. Mr. Holder is fully aware that these Defendants are the world largest distributor of pornography. Mr. Holder is fully aware that the content they distribute is highly addictive and has the same impact on a viewers brain and reward cycle as using cocaine. Mr. Holder is fully aware that Apple and Hewlett-Packard are violating obscenity laws in every state by distributing pornography to minors. Yet, he is not been responsive whatsoever. Mr. Holder is aware of Apple and Hewlett-Packard's predatory pornographer's

efforts to scam, trick, and force their customers to interact with highly addictive computer porn, distributed and ratified by Apple and Hewlett-Packard.

453. Mr. Holder is aware that it his duty to enforce this law: 18 U.S.C. § 2252: Federal law prohibits the production, distribution, reception, and possession of an image of child pornography using or affecting any means or facility of interstate or foreign commerce (See 18 U.S.C. § 2251; 18 U.S.C. § 2252; 18 U.S.C. § 2252A).

454. Mr. Holder is aware that Apple and Hewlett-Packard have mislead the public that their devices are pornography free through fraud and false advertisement.

455. Mr. Holder knows that Apple and Hewlett-Packard are in violation of 18 U.S.C. § 2252 by distributing child pornography and other forms of illegal pornography to minors and adults.

456. Mr. Holder has not been responsive to these criminal violations

457. Mr. Holder is aware that Apple and Hewlett-Packard have made large financial contributions to the Obama administration.

458. Mr. Holder is knows that Apple and Hewlett-Packard are proponents of homosexual marriages and proponents of all kinds of sex addiction because sex addicts buy their products to have unlimited access to the worlds largest distribution of porn.

459. Mr. Holder knows that the dangerous and defective manner that Apple sells their products in has caused the demand side of sex trafficking to dramatically increase, along with child pornography production.

460. Mr. Holder has not prosecuted a single obscenity case since President Obama took office.

461. Mr. Holder knows that knew that Apple and Hewlett-Packard were not complying with the federal laws when they sold me their dangerous product and subjected me to predatory

pornographers who injured me.

If Mr. Holder had made the Defendants comply with the law I would not have been injured.

462. Mr. Holder breached a duty owed to me.

463. Mr. Holder is a Federal actor. Because of Mr. Holders' failure to enforce the law, despite his immediate awareness of Apple and Hewlett-Packards violation, there was a undue and wrongful taking of my right of the pursuit of happiness and other fundamental rights violating due process.

464. Mr. Holder has acted in concert with the Defendants, ratifying their criminal enterprise by not taking action against them for their uncountable number of violations of state and federal laws in working with predatory pornographers in inflict pornography addiction on American society.

465. Mr. Holder knows good and well that Apple and Hewlett-Packard's devices are so defective, in light of their scams, that they are literally spreading an addiction to the point that it poses a threat to our National security from the inside out.

466. Mr. Holder has refused to met with former Federal Prosecutors from the Department of Justice, like Pat Trueman, who has approached him with hundreds of signatures from concerned citizens, begging him to enforce obscenity laws.

467. Mr. Holder does not have a single valid and lawful excuse for his flagrant and rampant fraud, mismanagement, waste, and dereliction of an affirmative duty.

468. Mr. Holder's intentional failure to act have risen to the level of service discrediting misconduct.

DOD VIOLATIONS OF THE 5th AMENDMENT AND 14TH FOR BEING NON-

RESPONSIVE TO TIMELY REPORTING OF DEMOCRATIC CONGRESSMAN JOHN MARK WINDLE'S VIOLATIONS OF ARMY REGULATIONS AND DOD REGULATIONS IN OPERATION IRAQI FREEDOM IN ENGAGING IN REPRISAL FOR WHISTLE BLOWING

469. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein. The Plaintiff was a First Lieutenant who deployed to Operation Iraqi Freedom with the 278th ACR, replacing the 155 from Mississippi. The LT Sevier took the slot of Colonel Stan Harris, of the Mississippi U.S. Attorney's office. While deployed the LT attempted to report Congressman John Mark Windle to the office of the Inspector General of the Army for violating Army Regulations, while on Title 10 for waste, mismanagement, abuse, and for having sexual relationship with a lower enlisted soldier. In response, the Congressman plotted with Major Lewis from 3rd ID to use the combat stress clinic as a reprisal mechanism to torture and silence the Plaintiff. The Congress violated DoD regulations for taking dramatic measures in reprisal for the Lieutenant's whistle blowing. The evidence in support of this is overwhelming and still in the Lieutenant's possession. The Plaintiff timely reported these violations to Major Roberts in Landstuhl Germany well within the 60 day threshold, providing direct evidence of Congressman Windle's violations of the law. Thirty days later the Lieutenant reported the violations to the Inspector General's office at Fort Campbell. Additionally, the Lieutenant reported the violations to the Department of Defense Office of the Inspector General, although the first reporting should have been more than enough to preserve the claims for the purposes of the statute of limitations. In August, 2013, the Lieutenant demanded that Congressman Windle be brought to accountability from the Department of Defense. The Department of defense falsely alleged that the Lieutenant failed to timely report the

matter and the statute of limitations had expired. This is flagrantly false and abusive. These matters have been used as a sword by the Lieutenant's opponents in civil litigation to injure him. The Department of Defense's non responsiveness is completely outrageous and a slap in the face to all service members. The reason for Eric Holder's non-responsiveness is evidently due to the fact that Congressman John Mark Windle is a Democrat legislature. This situation is no different that IRS targeting of Christian groups. DoD is selectively enforcing the rules in order to advance a political agenda. That is how the Government operates in Iran, not the United States. The Department of Defenses non-responsiveness to my repeated timely complaints demonstrate a violation of the 5th amendment due process clause and the 14th amendment equal protection clause - discrimination on the basis of not being a Democrat and for religious purposes. DoD has grossly deprived me of the right to impose a deterrent on a tyrant like Congressman John Mark Windle. Eric Holder as the head of the Department of Defense has engaged in willful service discrediting misconduct by not being responsive. He must be held accountable. I was not risking my life in Iraq for the rule of law mission only to return to find that it is not controlling in our Nation. I demand a full investigation into these matters by the Inspector General. I demand a comprehensive Congressional hearing on these matters. I want Justice so that the kind of fraud and abuse that took place overseas never happens again. I am prepared to cover down on and respond to any reprisal that follows filing this lawsuit. Reprisal on top of reprisal seems to be a way of life for several people involved in this case, who have convinced themselves that the rule of law is not governing, but my resolve is to demonstrate with convincing clarity that it is.





NEGLIGENT MISREPRESENTATION

470. The Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein

471. Apple and HP made false statements of past or existing fact regarding their product

472. The statements were directed at the suing party.

473. The statements had acted to induce the suing party to contract. The falsities caused injury.

WHEREFORE,

1. Plaintiff demands a preliminary and permanent injunction be imposed on products created by Apple and Hewlett Packard, going forward that requires the installation of software that makes reasonable attempts to block pornography online. The Plaintiff demands that the injunction cause Hewlett Packard and Apple to comply with child obscenity laws. The Plaintiff asks that the filtering software not be removed, by Apple or Hewlett Packard unless the purchaser can prove

that he is over 18 years of age and requests that the filters be removed. Otherwise, the filters should remain in place.

2. The Plaintiff demands that the Court order the Defendants to set up a system of face to face accountability where the purchaser who wants to deactivate the filter must provide proof that they are over 18 in person.

3. The Plaintiff demands that the Defendants be required to keep a list of every person who wants to have the filter deactivated and that the list be made available to the public at all times.

4. The Plaintiff demands an award of pre-and post-judgment interest;

5. The Plaintiff demands an preliminary to recall all products to install sufficient mechanism to cure their defectiveness and dangerousness as complained of.

6. The Plaintiff demands a preliminary and permanent injunction that forces the Defendants to send out a filtering system as part of their next operating system with continuous software to keep them compliant with the laws on devices that they have already sold but remain within their control. If the purchasers of these already sold products want their filter removed, require that they go to designated Apple and Hewlett-Packard stores and provide proof of ID and have their named added to the public list in order to do so. Apple and Hewlett-Packard sold these devices under false pretense that they were "porn free" and they should be ordered to deliver on that promise, since they have defrauded the public through false advertising and lies. I should not be the only one who is outraged over this.

7. The Plaintiff demands a preliminary and permanent injunction that requires to the Defendants

to provide any customer who seeks to have the filter removed, who is over the age of 18, with a literature on the addicting qualities of the pornography that they are distributing. The Plaintiff demands that the Defendants be required to provide a warning on with every computer of the consequences of interacting with porn on their site like as the British Prime Minister suggested.

8. The Plaintiff demands a preliminary and permanent injunction that requires the Defendants to form a joint task force with law enforcement to offset the dangerous conditions they have exposed them to by selling their products in a dangerous condition. The Plaintiff demands that a permanent and preliminary injunction be imposed on Apple and HP to work with law enforcement to block websites that are likely engaging in organized crime, like Backpages.com.

9. The Plaintiff demands that he be awarded an amount over \$75,010 minimal jurisdictional limit to cover loss of income, medical expenses, costs, disbursements, reasonable attorneys fees, interest, for his personal damages, and whatever other relief the Court deems just and equitable.

10. The Plaintiff demands and injunction that requires Apple and Hewlett Packard to respond in favor to joining a joint task force the United Kingdom in filtering porn online to protect children and families.

11. The Plaintiff request compensatory damages under every count, treble damages, punitive damages, equitable damages,

12. The Plaintiff demands a declaration that FCC and FTC representatives violated his Constitutional rights. The Plaintiff demands an injunction ordering them to be responsive to my demands and to alleviate the violations.

13. The Plaintiff demands a declaration that Eric Holder violated his Constitutional rights. The Plaintiff demands that a injunction requiring Eric Holder to enforce child obscenity laws against Apple and Hewlett-Packard.

14. The Plaintiff demands that the Court order the office of the Inspector General to investigate all of the matters it has jurisdiction over surrounding these affairs. The Plaintiff demands that the Attorney General either agree to enforce the laws against device makers, since selective application of the law is not his right, but rather, it is his legal duty to enforce the laws as written, not pick and choose (reducing himself into a legislature).

15. The Plaintiff demands any and all other forms of damage award that this Court deems to be just and proper, to include any and all available equitable relief under each cause of action alleged and implied.

16. The Plaintiff demands an award of the maximum punitive damages to be paid out to the following organizations to help combat pornography addiction and sex trafficking that the Defendants have inflicted upon our state, Nation, and world:

1. LA Dream Center (Los Angeles)
2. Tim Keller Redeemer Church New York City.
3. A21 Campaign, a 501(c)(3) non-profit, non-governmental organization that works to fight human trafficking
4. Orphan Secure
5. International Justice Mission
6. Cross Point Church and West End Community Church (Nashville TN).

7. Life Church (Memphis)
8. Willow Creek (Chicago)
9. McClean Bible Church (DC)
10. Free Chapel Church (GA)
11. Hand of Hope Ministries - Joyce Meyer
12. New LIfe Church (Arkansas)
13. Healing Place (Louisiana)
14. Hillsong Church (Paris)
15. Hillsong Church (Australia)
16. Time Square Church (New York City)
17. North Point Church (GA)
18. South Eastern Christian (KY)
19. White Ferry Road Church (West Monroe LA)
20. Oasis Church (Los Angeles)
21. Church of the Highlands (Birmingham AL)
22. Hillsong Church (London)
23. The Well House (Birmingham Alabama)
24. Morality In Media
25. Substance Church (Minesota)
26. Sea Coast (SC)
27. C3 (North Carolina)
28. Adventures in Missions - Athens Georgia

29. I would like the defendants to consider bank rolling this: http://www.faithit.com/the-way-this-video-connects-porn-and-global-injustice-will-make-you-see-the-world-in-a-very-different-way-warning-you-cant-unwatch-this/#.Us__vrUZ_yU.facebook

30. Saddle Back Church (CA)

31. Calvary of Albuquerque (New Mexico)

32. Christian Fellowship (Palm Beach FL)

33. The Rock Church (San Diego)

34. Crossroads (Cincinnati OH)

35. Gate Way Church (Dallas TX)

36. Heritage Christian Center (Denver)

37. Bethel Baptist (Jacksonville FL)

38. Celebration Church (Austin)

39. Celebration Church (Jacksonville FL)

40. First Baptist Church (Orlando)

41. Maranatha Chapter

42. Abolition International

43. Agape International Missions, a nonprofit organization in Cambodia

44. Childhope Asia Philippines,

45. Coalition to Abolish Slavery and Trafficking, a Los Angeles

46. Freedom Matters

47. ABC Nepal, a non-profit non- governmental organisation working in Nepal on trafficking of girls and minors across India and Arabian countries, founded by Durga Ghimire.

48. AFESIP (Agir pour les Femmes en Situation Precaire or Acting for Women in Distressing Situations), a Cambodian NGO dedicated to rescuing, housing and rehabilitating women and children in Cambodia, Laos, and Vietnam who have been sexually exploited.

49. AFESIP conducts outreach work to try helping the women still enslaved. The organization also works with law enforcement to raid the brothels.

50. Alliance Anti Trafic, a non-profit organization working in Southeast Asia on the causes and consequences of trafficking in persons and sexual exploitation.

51. Apne Aap Women Worldwide, a grassroots movement to end sex trafficking based in New Delhi, founded by Ruchira Gupta Apne Aap Women's Collective (AAWC), helping the women and children of the Kamathipura red light district in Mumbai, and unaffiliated with the Apne Aap Women Worldwide organization.

52. 8th Day Center for Justice, a Roman Catholic non-profit organization based in Chicago, Illinois A Better World, an organization that is based in Lacombe, Alberta, Canada.

53. ACT Alberta, a Canadian coalition of Government of Alberta representatives, non-governmental organizations, community organisations, and the Royal Canadian Mounted Police

54. Agape International Missions, a nonprofit organization in Cambodia.

55. Araminta Freedom Initiative, a Baltimore based non-profit whose vision is to see the commercial viability of the human trafficking of minors in the Baltimore region dismantled and its victims freed.

56. Arizona League to End Regional Trafficking, a coalition representing partnerships with law enforcement, faith-based communities, non-profit organizations, social service agencies, attorneys and concerned citizens.

57. Breaking Free, a nonprofit organization based in Saint Paul, Minnesota, United States that provides various services to prostitutes, such as help finding a place to live and a job outside the sex industry

58. "Breaking Out Corporation", a 501 (c) (3), a pro-active, not-for-profit organization whose mission is dedicated to Identify, Investigate and Rescue Victims of Human Trafficking, domestically and internationally. Breaking Out Corporation works in concert with law enforcement to affect Human Trafficking at its source. Breaking Out was specifically formed to fill desperate need in the fight against Human Trafficking to bridge the gap between awareness and action.

59. California Against Slavery, a human rights organization directed at strengthening California state laws to protect victims of sex trafficking
Called to Rescue, a non-profit worldwide

organization based in Vancouver, Washington given to rescuing minor children from sex trafficking, violence and abuse.

60. Centre to End All Sexual Exploitation, a nonprofit organization that helps human trafficking victims, sex workers, and the homeless by providing them with resources.

61. Chab Dai, a coalition founded by Helen Sworn that connects Christian organizations committed to ending sexual abuse and trafficking.

62. Childhope Asia Philippines, an international, non-profit, non-political, non-sectarian organization whose principal purpose is to advocate for the cause of street children throughout the worldChildren of the Night, the first and most comprehensive sex trafficking program in North America, including a 24 bed shelter home for 11-17 year olds.

63. Children for Change Cambodia is a local, Cambodian-led NGO working to prevent the sexual exploitation of children in the Sensok community by providing educational scholarships. CCC's Center is a hub of activity in the middle of Phnom Penh's poorest red-light district. At CCC, children have access to a small library, daily classes, and often the only meal they may eat that day.

64. Children's Organization of South East Asia, the Children's Organization of Southeast Asia, COSA is an International Organization which works towards the prevention of child human

trafficking and sexual exploitation within the Northern regions of Thailand.

65. Children's Rescue Initiative, an international organization which actively rescues children and slaves from human trafficking and child labor.

66. Coalition Against Trafficking in Women, an international non-governmental organization opposing human trafficking, prostitution, and other forms of commercial sexCoalition to Abolish Slavery and Trafficking, a Los Angeles-based anti-human trafficking organizationCrowns of Hope provides financial assistance and Christian therapy for female victims of human trafficking and sexual abuse in Central Texas.

67. Deborah's Gate, a human trafficking victims safe house run by The Salvation Army in Vancouver, British Columbia, Canada that opened in 2009.

68. Destiny Rescue, is a grassroots, internationally recognized, Christian based, non-profit organization dedicated to rescuing children from human trafficking and sexual exploitation. We help rescue the sexually exploited and enslaved, restore the abused, protect the vulnerable, empower the poor and are a voice for those that can't speak up for themselves. Currently we are operating in Thailand, Cambodia, Laos, Myanmar (Burma), India and Mozambique.

69. ECPAT, an international non-governmental organization and network headquartered in

Thailand which is designed to end the commercial sexual exploitation of children

70. Emancip ACTION (www.emancipation.org), a Mumbai-based international, non-profit organization dedicated to putting an end to the commercial sexual exploitation of children around the worldThe Emancipation Network, an international organization dedicated to fighting human trafficking and modern-day slaveryEVE, an advocacy group based in Vancouver, British Columbia, Canada.

71. Face to Face Bulgaria, an organization whose primary mission is to prevent cases of forced prostitution and human trafficking in Bulgaria.

72. Florida Abolitionist, a nonprofit, non-governmental organization opposing human trafficking in Florida, United StatesFreedom Matters, a UK charity fighting trafficking and modern day slavery principally in Nepal but operating in India and beyond.This list is incomplete; you can help by expanding it.

73. Free for Life International,a U.S.-based non-profit human rights organization that globally works to partner with organizations and individuals globally to rescue victims and meet the needs of trafficking survivors and those who are considered to be in high risk of being trafficked. They partner by providing financial, emotional and spiritual support(<http://freeforlifeintl.org/>, <https://www.facebook.com/Freeforlifeintl>)GABRIELA, a leftist Filipino organization that advocates for women's issues

74. Global Alliance Against Traffic in Women, a network of more than 100 non-governmental organizations from all regions of the world, who share a deep concern for the women, children and men whose human rights have been violated by the criminal practice of trafficking in persons Global Impact Phils Foundation, a Philippines-based organization that works to prevent human-trafficking (<http://www.myglobal.org/>, https://www.facebook.com/myglobal?directed_target_id=0)

75. Go MAD Ministries is a Christian not-for-profit based out of Texas established to fight human exploitation in the Dominican Republic. (Go MAD Ministries on Facebook)

76. Happy Horizons Children's Ranch is a humanitarian ministry of the Assemblies of God, Philippines. It is a non-profit organization dedicated to the rehabilitation and defense of street children in the Philippines <http://www.hhcr.orgIng>

77. International Justice Mission, a U.S.-based non-profit human rights organization that operates in countries all over the world to rescue victims of individual human rights abuse.

78. International Princess Project: advocating for women enslaved in prostitution; restoring their broken lives; empowering them to live free. The vision of International Princess Project is for International women once enslaved in the sex trade to have the opportunity to support themselves with skill and dignity, to heal in body, and spirit, and to live lives of freedom and for

people worldwide to gain awareness about human trafficking and to rise up with finance and action to end forced prostitution. www.intlprincess.org

79. TEMP - Institute for Trafficked, Exploited & Missing Persons, an international organization dedicated to ending contemporary slavery and human trafficking through public awareness, research and direct intervention.

80. Kabataang Gabay sa Positibong Pamumuhay (KGPP), Inc. an association of survivors and victims of male trafficking for the purpose of prostitution, pornography, the trade of illicit drugs, organized crime and exploitative forms of labor in the Philippines. Known for its ROLLI Fellowship, a survivor engagement program anchored on the core principles of human dignity, human rights and human capacity in empowering, enabling and engaging survivors in combating human trafficking and addressing the sequel of health and social ills arising from it among those who are afflicted.

81. La Strada International Association, an international NGO network addressing trafficking in human beings in EuropeLondon Anti-Human Trafficking Committee, a London, Ontario, Canada-based nonprofit organisation opposing human trafficking by means of advocacy and education.

82. Love 146 - Vision- The abolition of child trafficking and slavery, nothing less. <http://love146.org/>Maiti Nepal, a non-profit organization in Nepal dedicated to helping victims of sex

trafficking.

83. MANNA Freedom, the human trafficking intervention arm of MANNA Worldwide working to prevent human trafficking in Eastern Europe through the building of Bridge To Life Homes.

84. Men Against Sexual Trafficking, a London, Ontario, Canada-based organisation that opposes human trafficking by educating men on the issue and encouraging them to stop buying sexual services provided by human trafficking victims.

85. Million Kids (Riverside, California) serves as the Training and Outreach Coordinator for the Riverside County Sheriff Anti-Human Trafficking Task Force. <http://www.millionkids.org> Mongolian Gender Equality Center, a non-governmental organization based in Ulaanbaatar, Mongolia.

86. MTV EXIT (www.mtvexit.org) is the world's largest behaviour change campaign in the fight against human trafficking and exploitation.

87. NASHI, a Saskatoon, Saskatchewan, Canada-based organisation that opposes human trafficking by raising awareness through education.

88. Not for Sale Campaign, a 501(c)(3) non-profit organization based out of California Office to Combat Trafficking in Persons, a government agency responsible for coordinating efforts to

address human trafficking in British Columbia, Canada.

89. Pillars of Hope, Inc. a faith based non profit that opposes human trafficking; is raising awareness and funds to build a restoration center in California; working to raise awareness of the tragedy occurring in the United States. url=<http://www.pillarsofhope.us> Polaris Project, a nonprofit, non-governmental organization that works to combat and prevent modern day slavery and human trafficking.

90. PREDA Foundation, a charitable organization that was founded in Olongapo City, Philippines in 1974.

91. Project Rescue, a nonprofit Assembly of God organization that exists to rescue and restore victims of sexual slavery. It was founded in the red light district of Mumbai, India in 1997. It has 12 locations throughout India, Nepal, Moldova, Bangladesh, Tajikistan and Spain. url=<http://www.projectrescue.com> Rahab Ministries Thailand, a Christian non-governmental organization that provides outreach for sexually trafficked women and children in Thailand.

92. Rapha House, a public benefit 501(c)(3) nonprofit committed to ending human trafficking, bonded labor and the sexual exploitation of children. url=<http://www.raphahouse.org> Ratanak International, an organization that rescues children from sexual slavery and then provides them with education, rehabilitation, and safety.

93. Reaching Out Romania, a non-governmental[35] charitable organization in Romania that helps girls ages 13 to 22 exit the sex industry.

94. Real Escape from the Sex Trade (REST) is a 501c3 faith-based nonprofit organization in Seattle, WA working to provide a path to freedom, safety and hope for victims of sex trafficking and people involved in the sex trade through direct services, prevention, mentorship, restorative housing, case management, educational assistance and demand reduction efforts. Redeem The Shadows (RTS) is a 501(c)3 faith based non-profit organization that combats human trafficking through awareness, prevention and rehabilitation (www.redeemtheshadows.com).

95. Redlight Children Campaign, a non-profit organization created by New York lawyer and president of Priority Films Guy Jacobson and Israeli actress Adi Ezroni in 2002 to combat worldwide child sexual exploitation and human trafficking.

96. Redlight Traffic, a 501(c)(3) non-profit that uses technology to unite organizations, communities, and individuals and say "NO" to human trafficking. Ricky Martin Foundation, an organization with the mission to advocate for the well-being of children around the world. Ride for Refuge, a cycling event that raises awareness and funds for displaced persons, including human trafficking victims.

97. Run 2 Rescue, a 501(c)(3) non-profit organization based in California that reaches, rescues and restores victims of sex trafficking. www.run2rescue.com. Salvando Corazones is a 501(c)(3)

non-profit organization that runs safe houses and is dedicated to the fight against human trafficking in Costa Rica.

98. Seeds of Hope Homes, INC, a 501 (c) 3 non-profit organization under Hands Up High Ministries which exists to educate, rehabilitate and eradicate sex trafficking.

www.seedsofhome.com.

99. Shared Hope International, a 501 (c) 3 non-profit organization which exists to rescue and restore women and children in crisis.

100. Silent Integrity (<http://silentintegrity.org.au>) is a not for profit organization (Incorporation No.A0057776M).

101. Slavery Footprint, a nonprofit organization based in Oakland, California that works to end human trafficking and modern-day slavery.

102. Slavery Report, a nonprofit organization based in Northern Virginia that works to maximize human trafficking reporting.

103. Somaly Mam Foundation, a registered 501(c)(3) nonprofit organization focused on combating the global sex slave trade through supporting the rescue, rehabilitation, and reintegration of the victims and through raising global awareness on the issue.

104. StAT NC (Stand Against Trafficking), a registered 501(c)(3) non profit organization dedicated to the healing and restoration of women who have been rescued from human trafficking. (<http://www.standagainstraffickingnc.org>) STIGMA, a Cyprus non-profit organisation for Anti-Trafficking and Protection of Victims of Sexual Abuse & Exploitation

105. Stop Child Trafficking Now, an organization founded by Lynette Lewis, an author and public speaker,

106. Stop the Traffik, a campaign coalition which aims to bring an end to human trafficking worldwide.

107. The Defender Foundation, a 501(c)3 Non-Governmental Agency formed to fight human trafficking through active activism of volunteers and tactical rescue teams (Shield Teams) who physically rescue victims both in the U.S. and worldwide.

108. The Protection Project, a 501(c)3 Non-Governmental organization based at the Johns Hopkins University, School of Advanced International Studies in Washington DC which advises governments on drafting and implementing anti-trafficking legislation and promotes the inclusion of trafficking in the curriculum of universities around the world Third World Movement Against the Exploitation of Women, an organization directed towards the liberation of women from all kinds of oppression and exploitation based on sex, race or class.

109. Tiny Hands International, a Christian nonprofit organization dedicated to helping orphaned and abandoned children and fighting sex trafficking in South Asia

110. Traffic J.A.M., International is a 501(c)3 dedicated to preventing commercial sexual exploitation in countries of origin through grass roots networks. Awareness cells are working in Universities, bus stations, plazas, elementary & secondary schools, markets, among taxi drivers & hotel staff ... Websites in English: ijamtraffic.com and in Spanish ijamtraffic.net.

111. Truckers Against Trafficking, a nonprofit organization that trains truck drivers to recognize and report instances of human trafficking.

112. Unlikely Heroes, an international, non-profit organization based in Los Angeles, CA that rescues and restores child victims of sex slavery worldwide, founded by Erica Greve.

113. Visayan Forum Foundation, a non-profit, non-stock and tax-exempt non-government organization in the Philippines established in 1991 Vital Voices, an international, non-profit, non-governmental organization that works with women leaders in the areas of economic empowerment, women's political participation, and human rights.

114. Wipe Every Tear (www.WipeEveryTear.org) rescues precious girls and women trafficked in the sex trade in South East Asia.

115. WalkFree (www.walkfree.org) is an international movement to end modern slavery worldwide.

116. Walk With Me Canada Victim Services, Canada based, providing victim services for survivors of human trafficking.

117. Women's Support Network of York Region, a nonprofit organization that serves the Regional Municipality of York in Ontario, Canada, operating with an anti-oppressive, anti-racist, feminist philosophy.

118. World Orphans, an organization that funds the creation of orphanages in developing countries.

Thanks so much,

Respectfully Submitted,

s/Chris Sevier Esq./

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Ghost WARS video for this lawsuit

GHOST WARS VIDEO FOR THIS LAWSUIT.

<http://www.youtube.com/watch?v=mxJK9F0SHuQ>

CERTIFICATE OF SERVICE

This motion was served on opposing counsel through ECF/PACER Filing System to the Defendants Attorney's of record to Tom-SexTrafficking-Wiseman at tom@wisemanashworth.com, and Professor Sara-Conflict of interest-Ford at sford@lightfootlaw.com

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